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## **Title V Operating Permit**

**All conditions in Sections III, IV, and VI of this Title V permit are enforceable by both the Administrator and the commissioner unless otherwise specified. Applicable requirements and compliance demonstration are set forth in Section III of this Title V permit. The Administrator or any citizen of the United States may bring an action to enforce all permit terms or conditions or requirements contained in Sections III, IV, and VI of this Title V permit in accordance with the Clean Air Act, as amended.**

## LIST OF ABBREVIATIONS/ACRONYMS

<i>Abbreviation/Acronym</i>	<i>Description</i>
ASTM	American Society of Testing and Materials
bhp	Break Horsepower
BTU	British Thermal Units
CAIR	Clean Air Interstate Rule
CEM	Continuous Emission Monitor
CFR	Code of Federal Regulations
CGS	Connecticut General Statutes
CO	Carbon Monoxide
CTDEEP	Connecticut Department of Energy & Environmental Protection
CTG	Control Technology Guidelines
DOD	Department of Defense
EH&S	Environmental, Health, and Safety
EU	Emissions Unit
EPA	Environmental Protection Agency
Gal	Gallon
GEU	Grouped Emissions Unit
H <sub>2</sub> SO <sub>4</sub>	Sulfuric Acid
HAP	Hazardous Air Pollutant
HCl	Hydrochloric Acid
HEPA	High Efficiency Particulate Air
hr	Hour
HVOF	High Velocity Oxygen Fuel
lb	Pound
MMBTU	Million British Thermal Units
mmHg	Millimeters Mercury
MSDS	Material Safety Data Sheet
NAICS	North American Industry Classification System
NESHAP	National Emission Standards for Hazardous Air Pollutants
No.	Number
NO <sub>x</sub>	Nitrogen Oxides
NSPS	New Source Performance Standard
NSR	New Source Review
O <sub>2</sub>	Oxygen
P	Permit
P&W	Pratt & Whitney
Pb	Lead
PM	Particulate Matter
PM-10	Particulate Matter less than 10 microns
Ppm	Parts per Million
ppmvd	Parts per million, volumetric basis dry
R	Registration
R&D	Research and Development
RACT	Reasonably Available Control Technology

## LIST OF ABBREVIATIONS/ACRONYMS, continued

<i>Abbreviation/Acronym</i>	<i>Description</i>
RCSA	Regulations of Connecticut State Agencies
SCR	Selective Catalytic Reduction
SIC	Standard Industrial Classification Code
SIMS	Site Information Management System
SIP	State Implementation Plan
SO <sub>2</sub>	Sulfur Dioxide
SOS	Standard Operating Scenario
tpy	Tons per year
TSM	Total Suspended Matter
TSP	Total Suspended Particulate
TV	Title V
ULSD	Ultra Low Sulfur Diesel (0.0015% sulfur by weight, dry basis)
ULSF	Ultra Low Sulfur Fuel (<15 ppm sulfur)
UTC	United Technologies Corporation
VOC	Volatile Organic Compound
wt%	Weight Percent

## Section I: Premises Information/Description

### A. PREMISES INFORMATION

Nature of Business: Uninstalled engine manufacturing, assembly, and testing  
Primary SIC: 3724  
NAICS: 336412

Facility Mailing Address: Pratt & Whitney, Division of UTC  
400 Main Street, Mail Stop 102-21  
East Hartford, CT 06108

Telephone Number: (860) 565-7929

### B. PREMISES DESCRIPTION

The Pratt & Whitney (P&W) East Hartford facility engages in development, manufacturing processes, assembly and testing of experimental and production aircraft engines, ground based gas turbine engines and components, as well as overhaul and repair of these engines. Facility operations include processes such as tank lines, welding operations, thermal spray, small ovens, furnaces, washers, laser drilling and welding, surface coating, miscellaneous machining, sub-slab ventilation, small engines, ceramic and chemical vapor deposition coating, facility heating, ventilating, and air conditioning and waste treatment operations. P&W stipulated that it exceeds the major source threshold for TSP, PM-10, SO<sub>2</sub>, NO<sub>x</sub>, VOC, CO and HAP emissions and is located in an ozone non-attainment area defined in RCSA §22a-174-1(103).

#### Powerhouse

Three powerhouse boilers (GEU-1) provide steam for process and building heating and cooling. The three boilers are registered (R 053-0039, 41 & 42).

A gas turbine based cogeneration system (EU-2) provides a portion of the electrical power required by the facility and also provides steam for process and building heating and cooling. The cogeneration system was issued the permit to construct 053-0049 on 10/10/1991, the permit to operate on 7/28/1995, a minor modification on 7/19/2006, and a revision on 7/19/2013. NO<sub>x</sub> emissions are controlled by selective catalytic reduction (SCR) and water injection. The turbine is equipped with a NO<sub>x</sub> continuous emission monitor (CEM). The turbine is subject to the New Source Performance Standard (NSPS) - Standards for Stationary Gas Turbines (40 CFR Part 60 Subpart GG) and the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Stationary Combustion Turbines (40 CFR Part 63 Subpart YYYY). However, per 40 CFR §63.6090(b)(4), existing turbines do not have to meet the requirements of 40 CFR Part 63 Subparts YYYY and A. The turbine is subject to RCSA §22a-174-22c (CAIR).

#### Emergency Engines

Currently, two diesel fired emergency engines and three natural gas fired emergency engines are subject to RCSA §22a-174-3b(e). Additional units may be brought on site as required. They have been grouped into GEU-4. One unit (Building M generator BT #474914) in this grouping has a rating higher than 500 brake horsepower and was constructed prior to December 19, 2002; therefore, it does not need to meet the requirements of 40 CFR 63 Subparts A and ZZZZ.

All diesel and natural gas fired emergency engines that are not required to be registered or permitted and are not covered under RCSA §22a-174-3b(e) have been grouped into GEU-5. These are insignificant sources.

## **Section I: Premises Information/Description**

### **B. PREMISES DESCRIPTION, continued**

#### **Engine Testing Operations**

Vitiated Inlet Air Heaters X-7 and X-8 (GEU-3) are used to preheat the inlet air for some uninstalled aircraft engine test programs. The two inlet air heaters are registered (R-053-0019 & 20).

The X-Test Burner Rigs (GEU-7) are used in conducting performance evaluation tests. The Burner Rigs are not required to be registered or permitted.

Test Cells X-7 and X-8 (GEU-8) are used to house uninstalled aircraft engines while they are being tested. The two Test Cells are not required to be registered or permitted.

#### **Spray Booths**

The facility has a number of permitted spray booths that apply both VOC and non-VOC based specialty coatings, R&D, DOD and fixture/facilities coatings. The Kayco Delux 140 and the ATI 3000 spray booths in the Overhaul & Repair Operations were issued permit to construct and operate 053-0055 on 3/30/1993 and a minor permit modification on 9/22/2008. Two DeVilbiss Turboclean spray booths in E building were issued permits to construct and operate 053-0065 and 053-0066 on 1/8/1997 and a minor permit modification on 9/22/2008. The Hollow Fan Blade coating booth (EHRO) was issued permit to construct and operate 053-0121 on 4/30/2008. The CANMC STC PB01 spray booth was issued permit to construct 053-0122 on 10/3/2000, the permit to operate on 3/28/2001 and a minor permit modification on 9/22/2008. The CANMC STC PB02 spray booth was issued permit to construct and operate 053-0133 on 10/31/2003. The MERL STC PB spray booth was issued permit to construct and operate 053-0124 on 9/18/2003. These spray booths have been grouped into GEU-11. Dry panel filters control particulate emissions for all booths except the Building E booths which are of a waterwall design. The facility is subject to the NESHAP for Aerospace Manufacturing and Rework Facilities (40 CFR Part 63 Subpart GG). However, P&W does not currently apply any primers or topcoats subject to the Aerospace NESHAP limits as all of the coatings applied qualify either as specialty coatings, R&D coatings, DOD coatings or are otherwise exempt coatings.

Spray booths that do not require registration or permit have been grouped into GEU-12.

The AMS high velocity oxygen fuel (HVOF) plasma spray booth (EU-16) was issued permit to construct and operate 053-0132 on 5/9/2002 and a minor permit modification on 9/22/2008. A cartridge collector and HEPA filter control particulate emissions.

#### **Cold Cleaning**

The cold cleaning units (GEU-14) are used to remove soils from metal surfaces of instrumentation and facilities equipment. They are not required to be registered or permitted.

#### **Miscellaneous Cleaning Operations**

Miscellaneous cleaning operations subject to the Aerospace NESHAP include miscellaneous hand wiping, spray gun cleaning and flush cleaning.

## Section II: Emissions Units Information

### A. EMISSIONS UNITS DESCRIPTION

Emissions units are set forth in Table II.A. It is not intended to incorporate by reference these NSR Permits, Orders, Registrations, or Regulations into this Title V permit.

<b>TABLE II.A: EMISSIONS UNITS DESCRIPTION</b>			
<b>Emissions Unit/ Grouped Emissions Unit</b>	<b>Emissions Unit Description</b>	<b>Control Unit Description</b>	<b>Permit, Order, Registration, or Regulation Number</b>
GEU-1	Union WT-10 Boiler 6 ~ 167 MMBTU/hr Union WT-VO Boiler 8 ~ 190 MMBTU/hr Union WT-VO Boiler 9 ~ 190 MMBTU/hr	None	R 053-0039 R 053-0041 R 053-0042 P 053-0049 Part VII 40 CFR 63 Subpart DDDDD
EU-2	27 MW FT-8 Gas Turbine Combined Cycle Cogeneration System with Heat Recovery Steam Generator – Constructed 1992	SCR Water Injection	P 053-0049
GEU-3	Vitiated Inlet Air Heaters X-7 & X-8	None	R 053-0019 & 20
GEU-4	Emergency Engines covered under RCSCA §22a-174-3b(e)	None	RCSCA §22a-174-3b(e) 40 CFR 60 Subpart III 40 CFR 63 Subpart ZZZZ
GEU-5	Emergency Engines with PTE < 15TPY – Diesel & Natural Gas	None	40 CFR 60 Subpart III 40 CFR 63 Subpart ZZZZ
GEU-11	Kayco Delux 140 & ATI 3000 paint spray booths (O&R) 2 DeVilbiss Turboclean paint spray booths (Building E) Hollow Fan Blade coating booth (EHRO) Specialty coating spray booth CANMC STC PB01 Specialty coating spray booth MERL STC PB Specialty coating spray booth CANMC STC PB02	Dry panel filters  Waterwall  Dry panel filters Dry panel filters Dry panel filters Dry panel filters	P 053-0055  P 053-0065 & 66  P 053-0121 P 053-0122 P 053-0124 P 053-0133
GEU-12	Miscellaneous paint spray booths	None	None
GEU-14	Cold Cleaning Units	None	RCSCA §22a-174-20(1)(3),(6),(7),(8)
EU-16	AMS HVOF plasma spray booth	Cartridge collector & HEPA filter	P 053-0132
<b><i>All applicable requirements for the following units are listed in the premises-wide general requirements portion of this Title V permit:</i></b>			
GEU-7	Burner Rigs – X-Test	None	None
GEU-8	Test Cells X-7 & X-8	None	None



## Section II: Emissions Units Information

### B. OPERATING SCENARIO IDENTIFICATION

The Permittee shall be allowed to operate under the following Standard Operating Scenario (SOS) without notifying the commissioner, provided that such operations are explicitly provided for and described in Table II.B. There are no Alternate Operating Scenarios for the premises.

<b>TABLE II.B: OPERATING SCENARIO IDENTIFICATION</b>	
<b>Emissions Units Associated with the Scenarios</b>	<b>Description of Scenarios</b>
GEU-1	Boilers operate using ULSD or natural gas to produce steam.
EU-2	Turbine operates using natural gas or ULSD and uses SCR and water injection for NOx reduction.
GEU-3	Heaters operate as needed to support test cell operation through combustion of fuel.
GEU-4	Engines operate using diesel or natural gas for emergency and testing purposes only.
GEU-5	Engines operate using diesel or natural gas for emergency, testing purposes, and for power interruption during construction, facility maintenance, or repairs.
GEU-7	Conducting of performance evaluation tests.
GEU-8	Housing uninstalled aircraft engines while they are being tested.
GEU-11 & 12	Spray booths apply specialty coatings, R&D coatings, DOD or exempt coatings to uninstalled engine parts, fixtures, parts and products. Units in GEU-11 use dry panel filters or a waterwall for PM control.
GEU-14	Cold cleaners operate as prescribed in RCSA 22a-174-20(1)(3), (6), (7), & (8), using cleaning solvents with a vapor pressure less than 4.3 kPa and at a temperature less than 50°C.
EU-16	Spray booth applies plasma coatings and uses a cartridge collector and HEPA filter for PM control.

### **Section III: Applicable Requirements and Compliance Demonstration**

The following contains summaries of applicable regulations and compliance demonstration for each identified Emissions Unit and Operating Scenario, regulated by this Title V permit.

#### **A. GROUPED EMISSION UNIT 1 (GEU-1) – Boilers 6, 8, and 9**

##### **1. Fuel Usage**

###### *a. Limitation or Restriction*

The Permittee shall burn an aggregate of no greater than 23,500,000 gallons per year of fuel oil over any consecutive 12-month period in Boilers 6, 8 & 9 (R 053-0039, 41 & 42). [P 053-0049 Part VII.A]

###### *b. Monitoring Requirements*

i. The Permittee shall operate fuel metering devices for Boilers 6, 8 & 9. [P 053-0049 Part VII.B]

###### *c. Record Keeping Requirements*

i. The Permittee shall make and keep records of the monthly and consecutive 12 month fuel usage of Boilers 6, 8 & 9. Consecutive 12-month fuel usage shall be determined by adding the current month's fuel usage to that of the previous 11 months. The Permittee shall make these calculations within 30 days of the end of the previous month. [P 053-0049 Part VII.C]

###### *d. Reporting Requirements*

i. The Permittee shall report annual fuel usage of Boilers 6, 8 & 9 in the annual emission statement. [RCSA §22a-174-4(d)(1)]

##### **2. Sulfur Content**

###### *a. Limitation or Restriction*

The Permittee shall operate Boilers 6, 8 & 9 on fuels with a sulfur content of no greater than 0.0015% by weight, dry basis. [P 053-0049 Part VII.A]

###### *b. Record Keeping Requirements*

i. The Permittee shall make and keep records of the sulfur content of each shipment of liquid fuel received at the 400 Main Street, East Hartford plant, either by (A) a shipping receipt and certification from the fuel supplier, or (B) performing an analysis using the method found in ASTM D4294, or (C) a copy of a current fuel supplier contract. Records for a fuel certification and analysis shall include the following information: the date of delivery, the name of the fuel supplier, type of fuel delivered, the percentage of sulfur in such fuel, by weight, dry basis, and the method used to determine the sulfur content of such fuel. Records for a current contract shall include the following information: the name of the fuel supplier, type or grade of fuel delivered and the percentage of sulfur in such fuel, by weight, dry basis. [P 053-0049 Part VII.D]

### **Section III: Applicable Requirements and Compliance Demonstration**

#### *c. Reporting Requirements*

- i. The Permittee shall report the average analytical or contractual sulfur content of the fuel oil burned in Boilers 6, 8 & 9 in the annual emission statement. [RCSA §22a-174-4(d)(1)]

### **3. Nitrogen Oxides**

#### *a. Limitation or Restriction*

The Permittee shall meet the nitrogen oxide emission limitations for Boilers 6, 8 & 9 of 0.20 lb/MMBTU when firing ULSD or 0.20 lb/MMBTU when firing natural gas. [RCSA §22a-174-22(e)(Table 22-1)]

#### *b. Monitoring Requirements*

- i. The Permittee shall conduct emission testing of each boiler to demonstrate compliance with the NO<sub>x</sub> emission limitation once every five years from the date of the previous test or five years from the date the previous test was due, whichever is earlier. [RCSA §22a-174-22(k)(1)]
- ii. The Permittee shall demonstrate compliance with the NO<sub>x</sub> emission limitation using sampling and analytical procedures approved under 40 CFR 60, Appendix A, or under procedures in RCSA §22a-174-5(d). Sampling shall be conducted when the source is at normal operating temperature and, unless allowed otherwise by the commissioner in a permit or order, is operating at or above ninety percent (90%) of maximum capacity. [RCSA §22a-174-22(k)(2)]

#### *c. Record Keeping Requirements*

- i. The Permittee shall keep the following records:
  - (A) Records of all tune-ups, repairs, replacement of parts and other maintenance;
  - (B) Copies of all documents submitted to the commissioner pursuant to RCSA §22a-174-22;
  - (C) Records of the dates, times, and places of all emission testing required by this section, the persons performing the measurements, the testing methods used, the operating conditions at the time of testing, and the results of such testing; and
  - (D) Any other records or reports required by an order or permit issued by the commissioner pursuant to RCSA §22a-174-22. [RCSA §22a-174-22(l)(1)(D), (E), (H) & (J)]
- ii. The Permittee shall retain all records and reports produced pursuant to the requirements of RCSA §22a-174-22 for five years. Such records and reports shall be available for inspection at reasonable hours by the commissioner or the Administrator. Such records and reports shall be retained at the source, unless the commissioner approves in writing the use of another location in the State. [RCSA §22a-174-22(l)(5)]

#### *d. Reporting Requirements*

- i. Within 30 days of the completion of emission tests conducted under the requirements of RCSA §22a-174-22(k)(1), the Permittee shall submit a written report of the results of such testing to the commissioner. [RCSA §22a-174-22(l)(2)]

### Section III: Applicable Requirements and Compliance Demonstration

- ii. On or before April 15 of each year, the Permittee shall submit a report on NO<sub>x</sub> emissions from such source, on a form provided by the commissioner. [RCSA §22a-174-22(1)(6)] The Permittee shall comply with this requirement by reporting NO<sub>x</sub> emissions for this emission unit in the annual emissions statement.

#### 4. HCL, Mercury, CO and Filterable PM

##### a. Limitation or Restriction

- i. The Permittee shall comply with the following emission limitations when burning liquid fuel by no later than January 31, 2016. The emission limitations shall apply to each boiler and at all times except during periods of start-up and shutdown [40 CFR §63.7500(a)]:
  - (A) HCl – 1.1E-03 lb/MMBTU (or alternative applicable limit);
  - (B) Mercury – 2.0E-06 lb/MMBTU (or alternative applicable limit);
  - (C) CO – 130 ppmvd @ 3% O<sub>2</sub> as measured using an O<sub>2</sub> analyzer system. The Permittee shall maintain a 30-day rolling average oxygen content at or above the lowest hourly average oxygen content measured during the most recent CO performance test (This limit will not apply to the Permittee if the installed Oxygen Trim System will set the trim system to the level specified in 40 CFR §63.7525(a)(7)); and
  - (D) Filterable PM – 7.9E-03 lb/MMBTU (or alternative applicable limit).

##### b. Monitoring Requirements

- i. The Permittee shall conduct an initial performance test for HCl, Mercury, CO, and Filterable PM in accordance with 40 CFR §63.7520 and Table 5 of 40 CFR 63 Subpart DDDDD. These tests shall be conducted no later than 180 days after January 31, 2016. [40 CFR §63.7510(a)(1)&(e)]
- ii. The Permittee shall conduct a fuel analysis of the ULSD burned in the boiler in accordance with 40 CFR §63.7521 and Table 6 of 40 CFR 63 Subpart DDDDD. This test shall be conducted no later than 180 days after January 31, 2016. [40 CFR §63.7510(a)(2)&(e)]
- iii. The Permittee shall demonstrate compliance with the emissions limits using annual performance stack testing or fuel analysis as applicable. Annual performance tests must be completed no more than 13 months after the previous performance test, unless performance tests for a given pollutant for at least 2 consecutive years show that the emissions are at or below 75% of the emissions limit for the pollutant and there are no changes in operation of the boiler that could increase emissions. In this case, a performance test for the given pollutants may be conducted no more than 37 months after the previous performance test. If the performance test indicates the pollutant emissions are above 75% of the emissions limitation, the Permittee shall conduct annual performance testing until all performance tests for that pollutant over a consecutive 2-year period are at or below 75% of the emissions limit. [40 CFR §63.7515(a), (b), & (c)] Annual performance stack testing is not required when burning ULSF if pollutants measured during the initial performance test meet the emission limits in 40 CFR 63 Subpart DDDDD Table 2, provided the type of fuel is monitored and recorded on a monthly basis. [40 CFR §63.7515(h)]

### **Section III: Applicable Requirements and Compliance Demonstration**

- iv. The Permittee shall install, operate, and maintain an oxygen analyzer system to demonstrate compliance with the CO emission limitation [40 CFR §63.7525(a)] or operate the Oxygen Trim System with the oxygen level set no lower than the lowest hourly average oxygen concentration measured during the most recent CO performance test as the operating limit for oxygen per 40 CFR 63 Subpart DDDDD Table 7 [40 CFR §63.7525(a)(7)].

#### *c. Recordkeeping Requirements*

- i. The Permittee shall use the results of the initial performance testing required in section III.A.4.b.i. of the Title V permit to establish operating limits in accordance with 40 CFR §63.7530 and Table 7 of 40 CFR 63 Subpart DDDDD. [40 CFR §63.7510(a)(3)]
- ii. The Permittee shall keep a copy of each notification and report submitted to comply with 40 CFR 63 Subpart DDDDD, including all documentation supporting any Notification of Compliance Status or semiannual report submitted.[40 CFR §63.7555(a)(1)]
- iii. The Permittee shall keep records of all performance tests, fuel analyses or other compliance demonstrations and performance evaluations. [40 CFR §63.7555(a)(2)]
- iv. The Permittee shall make and keep records of monthly fuel use by the boiler, including the type of fuel and amount used.[40 CFR §63.7555(d)(1)]
- v. The Permittee shall make and keep records of the 30-day rolling average oxygen content for the boiler on a daily basis unless an Oxygen Trim System is utilized. Such records shall be made by averaging the current day's oxygen content with the previous consecutive 29 days. [RCSA §22a-174-33(j)(1)(K)(ii)]
- vi. The Permittee shall keep a copy of all calculations and supporting documentation of maximum chlorine fuel input to demonstrate continuous compliance with the HCl emission limit. [40 CFR §63.7555(d)(4)]
- vii. If stack testing is conducted less frequently than annually, the Permittee shall keep a record to demonstrate the emissions in the previous stack tests were less than 75% of the applicable emission limit and document that there was no change in boiler operations including fuel composition and operation of air pollution control equipment that would cause emissions of the relevant pollutant to increase within the past year [40 CFR §63.7555(d)(6)], except when combusting ULSF if pollutants measured during the initial performance test meet the emission limits in 40 CFR 63 Subpart DDDDD Table 2 [40 CFR §63.75515(h)].
- viii. The Permittee shall make and keep records of the occurrence and duration of each malfunction of the boiler, or of the associated air pollution control and monitoring equipment and of actions taken during periods of malfunction to minimize emissions, including corrective actions to restore the malfunctioning boiler or process heater, air pollution control, or monitoring equipment to its normal or usual manner of operation. [40 CFR §63.7555(d)(7)&(8)]
- ix. The Permittee shall make and keep records of the calendar date, time, occurrence, and duration of each start-up and shutdown event and the fuels used during each start-up and shutdown event. [40 CFR §63.7555(d)(10)&(11)]

### **Section III: Applicable Requirements and Compliance Demonstration**

#### *d. Reporting Requirements*

- i. The Permittee shall submit a Notification of Compliance Status for each boiler including all performance test results and fuel analyses before the close of business on the 60<sup>th</sup> day following the completion of all initial performance tests or initial compliance demonstrations for all boilers at the facility. The Notification of Compliance Status shall also be submitted within 60 days of any deviation from any emission limit or operating limit. The Notification of Compliance Status shall contain the following [40 §CFR 63.7545(e)]:
  - (A) A description of the boiler including identification of which subcategories the unit is in, the design heat capacity of the unit, a description of the add-on controls used on the unit to comply with the subpart, description of the fuels burned, and justification for the selection of fuels burned during the compliance demonstration.
  - (B) Summary of the results of all performance tests and fuel analyses, and calculations conducted to demonstrate initial compliance including all established operating limits and including:
    - (1) Identification of whether the Permittee is complying with the PM emission limit or the alternative TSM emission limit.
    - (2) Identification of whether the Permittee is complying with the output-based emission limits or the heat input-based (i.e., lb/MMBtu or ppm) emission limits
  - (C) A summary of the maximum CO emission levels recorded during the performance test to show that the applicable CO emission limitation has not been exceeded.
  - (D) Identification of whether the Permittee plans to demonstrate compliance with each applicable emission limit through performance testing, as CEMS, or fuel analysis.
  - (E) A signed certification that you have met all applicable emission limits and work practice standards.
  - (F) A description of the deviation, the duration of the deviation, and the corrective action taken in the Notification of Compliance Status report, as applicable.
  - (G) The Notification of Compliance Status shall be signed by a responsible official and contain the following certifications:
    - (1) “This facility complies with the required initial tune-up according to the procedures in 40 CFR §63.7540(a)(10)(i) through (vi).”
    - (2) “This facility has had an energy assessment performed according to 40 CFR §63.7530(e).”
    - (3) “No secondary materials that are solid waste were combusted in any affected unit.”
- ii. Within 60 days of completing any performance test or evaluation, the Permittee shall submit the results to EPA. [40 CFR §63.7550(h)(1)]

### **Section III: Applicable Requirements and Compliance Demonstration**

- iii. The Permittee shall keep records required by Section III.A.4.c. of the Title V Permit for a period of 5 years from the date that each record was created and must be made available upon request. [40 §CFR 63.7560(b)&(c)]

#### **5. Work Practice Standards**

##### *a. Limitation or Restriction*

- i. The Permittee shall comply with the following work practice standards no later than January 31, 2016:
  - (A) Conduct an initial tune up of each boiler. [40 CFR §63.7510(e)] Subsequent tune ups of the boiler shall be conducted annually or every five years if an Oxygen Trim System is utilized. The tune-up shall include the following [40 CFR §63.7540(a)(10)]:
    - (1) An inspection of the burner, cleaning and replacement of any components of the burner, as necessary.
    - (2) An inspection of the flame pattern and adjustment of the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications.
    - (3) Optimization of total emissions of CO. This optimization should be consistent with the manufacturer's specification and with the boiler's NO<sub>x</sub> limitation.
    - (4) Measurement of the concentrations in the effluent stream of CO in parts per million by volume (ppmv) and oxygen in weight percent (wt.%) before and after the adjustments are made.
  - (B) Must have a one-time energy assessment performed by a qualified energy assessor. An energy assessment completed on or after January 1, 2008, that meets or is amended to meet the energy assessment requirements, satisfies the energy assessment requirement. The energy assessment must include [40 CFR §63.7510(e)]:
    - (1) A visual inspection of the boiler system.
    - (2) An evaluation of operating characteristics of the boiler systems, specifications of energy using systems, operating and maintenance procedures, and unusual operating constraints.
    - (3) An inventory of major energy use systems consuming energy from affected boilers and process heaters and which are under the control of the Permittee.
    - (4) A review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage.
    - (5) A review of the facility's energy management practices and provide recommendations for improvements consistent with the definition of energy management practices, if identified.
    - (6) A list of cost effective energy conservation measures that are within the facility's control

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- (7) A list of the energy savings potential of the energy conservation measures identified.
- (8) A comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping those investments.
- (C) The Permittee shall operate and maintain the boiler including associated air pollution control equipment and monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions. [40 CFR §63.7500(a)(3)]

#### *b. Recordkeeping Requirements*

- i. The Permittee shall make and keep records of the annual tune-ups including the following information [40 CFR §63.7540(a)(10)]:
  - (A) The concentrations of CO in the effluent stream in ppmv and oxygen in wt. % measured before and after the tune-up of the boiler.
  - (B) A description of any corrective action taken as part of the tune-up.
  - (C) The type and amount of fuel used over the 12 months prior to the tune-up.
- ii. The Permittee shall make and keep records sufficient to prove a comprehensive energy assessment was completed including the date on which such energy assessment was conducted. [RCSA §22a-174-4(d)(1)]

#### *c. Reporting Requirements*

- i. The Permittee shall keep records required by Section III.A.5.b. of the Title V Permit for a period of 5 years from the date that each record was created and must be made available upon request. Such records shall be kept or readily accessible from on site for at least 2 years after the record was created. Records may be kept off-site for the remaining 3 years. [40 CFR §63.7560(b)&(c)]

### **B. EMISSIONS UNIT 2 (EU-2) – FT-8 Stationary Gas Turbine Cogeneration System**

#### **1. Fuel Consumption**

##### *a. Limitation or Restriction*

The maximum fuel consumption over any consecutive 12-month period for the FT-8 Stationary Gas Turbine Cogeneration System is 6,145,400 gallons of ULSD. There are no restrictions on the consumption of natural gas. [P 053-0049 Part II.A.1]

##### *b. Monitoring Requirements*

- i. The Permittee shall monitor the fuel consumption of the fuels burned in the FT-8 Stationary Gas Turbine Cogeneration System, using the CEM system. [RCSA §22a-174-33(j)(1)(K)(ii)]



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#### *c. Record Keeping Requirements*

- i. The Permittee shall make and keep records of the monthly and consecutive 12-month fuel consumption of the fuels burned in the FT-8 Stationary Gas Turbine Cogeneration System. The consecutive 12-month fuel usage shall be determined by adding the current month's fuel usage to that of the previous 11 months. The Permittee shall make these calculations within 30 days of the end of the previous month. [P 053-0049 Part IV.B.1]

#### *d. Reporting Requirements*

- i. The Permittee shall report annual fuel consumption for the FT-8 Stationary Gas Turbine Cogeneration System in the annual emission statement. [RCSA §22a-174-4(d)(1)]

## **2. Fuel Sulfur Content**

#### *a. Limitation or Restriction*

The fuel oil sulfur content for the FT-8 Stationary Gas Turbine Cogeneration System is limited to 0.0015% by weight, dry basis. [P 053-0049 Part II.A.2]

#### *b. Monitoring Requirements*

- i. The Permittee shall monitor the total sulfur content of all liquid fuel being fired in the FT-8 Stationary Gas Turbine Cogeneration System. The sulfur content of the fuel must be determined using the total sulfur methods described in 40 CFR §60.335(b)(10). [40 CFR §60.334(h)(1)] The sampling frequency shall be conducted as described in sections 2.2.3, 2.2.4.1, 2.2.4.2, and 2.2.4.3 of 40 CFR Part 75 Appendix D. [40 CFR §60.334(i)(1)] The fuel analyses required under 40 CFR §60.335(b)(10) may be performed by the Permittee, a service contractor retained by the Permittee, the fuel vendor, or any other qualified agency. [40 CFR §60.335(b)(11)] [P 053-0049 Part IV.A.2]

#### *c. Record Keeping Requirements*

- i. The Permittee shall make and keep records of the sulfur content of each shipment of liquid fuel received at the 400 Main Street, East Hartford plant, either by (A) a shipping receipt and certification from the fuel supplier, or (B) performing an analysis using the method found in ASTM D4294, or (C) a copy of a current fuel supplier contract. Records for a fuel certification and analysis shall include the following information: the date of delivery, the name of the fuel supplier, type of fuel delivered, the percentage of sulfur in such fuel, by weight, dry basis, and the method used to determine the sulfur content of such fuel. Records for a current contract shall include the following information: the name of the fuel supplier, type or grade of fuel delivered and the percentage of sulfur in such fuel, by weight, dry basis. [P 053-0049 Part VII.A]

#### *d. Reporting Requirements*

- i. The Permittee shall report the average analytical or contractual sulfur content of the fuel oil burned in the FT-8 Stationary Gas Turbine Cogeneration System in the annual emission statement. [RCSA §22a-174-4(d)(1)]

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- ii. The Permittee shall submit reports of excess emissions to the Administrator/commissioner, in accordance with 40 CFR §60.7(c). For the purpose of reports required under §60.7(c), periods of excess emissions that shall be reported are defined in 40 CFR §60.334(j). The Permittee shall meet this requirement by submitting the Quarterly Report to the commissioner.

#### 3. Allowable Emission Limits

##### a. Limitation or Restriction

The Permittee shall not exceed the emission limits stated herein at any time for the FT-8 Stationary Gas Turbine Cogeneration System. [P 053-0049 Part III.A]

<u>Criteria Pollutants</u>	<u>tpy</u>
PM-10/PM-2.5/PM	12.53
SO <sub>2</sub>	0.96
NO <sub>x</sub>	42.62
VOC	3.36
CO	77.77
Pb	0.006

##### Non-Criteria Pollutants

Sulfuric Acid	0.753
Ammonia	19.14

- ii. The Permittee shall properly operate and maintain this equipment in accordance with the manufacturer's specifications and written recommendations. [P 053-0049 Part V.A.]
- iii. The Permittee shall properly operate the control equipment at all times that the FT-8 Stationary Gas Turbine is in operation and emitting air pollutants. [P 053-0049 Part V.B.]

##### b. Monitoring Requirements

- i. The Permittee shall inspect the SCR catalyst once per year, at a minimum, and replace it as required through the monitoring of the catalyst test pieces. [P 053-0049 Part IV.A.4]
- ii. The Permittee shall monitor the NO<sub>x</sub> emissions from the FT-8 Stationary Gas Turbine Cogeneration System using a continuous emissions monitor. All CEM equipment shall be operated in compliance with RCSA §22a-174-4. Continuous emissions monitoring shall be required during all periods of operation, including periods of start-up, shutdown, malfunctions or emergency conditions. [P 053-0049 Part IV.A.1]

##### c. Record Keeping Requirements

- i. The Permittee shall make and keep records of the annual emissions for the FT-8 Stationary Gas Turbine Cogeneration System using fuel usage and emission factors from the following sources [RCSA §22a-174-4(d)(1)]:

(A) NO<sub>x</sub>: CEM.

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- (B) CO: P&W Power Systems emission test data for FT-8 turbines, operating at base load or higher, as listed below.

<u>Natural Gas fired</u>	<u>lb/MMBTU</u>
CO	0.049

<u>ULSD fired</u>	
CO	0.024

- (C) PM-10, SO<sub>2</sub>, VOC, & Pb (for all fuels): Compilation of Air Pollutant Emission Factors, AP-42, Fifth edition, Table 3.1-2a, page 3.1-11, April 2000.
- (D) H<sub>2</sub>SO<sub>4</sub> (ULSD): CTDEEP emission factor of 2.45 S lb/1000 gal for liquid fuel, where S is the maximum percent sulfur content by weight.
- (E) Ammonia: Calculation from 10 ppmvd or from test data.
- (F) Hazardous Air Pollutants: Compilation of Air Pollutant Emission Factors, AP-42, Fifth edition, Tables 3.1-3 to 5, pages 3.1-13 to 15, April 2000.
- ii. The Permittee shall keep records of the inspection of the SCR catalyst. The records shall include the name of the person inspecting the SCR catalyst, the date of inspection, the results of the inspection and the date the catalyst is replaced. [RCSA §22a-174-4(d)(1)]

*d. Reporting Requirements*

- i. The Permittee shall report the actual emissions from the FT-8 Stationary Gas Turbine Cogeneration System in the annual emission statement. [RCSA §22a-174-4(d)(1)]

#### 4. Opacity

*a. Limitation or Restriction*

- i. The maximum opacity shall not exceed 10% except during start-up, shutdown and malfunction. [P 053-0049 Part III.C]
- ii. During periods of start-up, shutdown and malfunction, opacity shall not exceed 20% during any six-minute block average. [P 053-0049 Part II.B.6]

*b. Monitoring Requirements*

- i. The Permittee shall monitor the opacity from the FT-8 Stationary Gas Turbine Cogeneration System using an opacity monitor when ULSD is fired. [P 053-0049 Part IV.A.1]

*c. Record Keeping Requirements*

- i. The Permittee shall make and keep records of the opacity from the FT-8 Stationary Gas Turbine Cogeneration System when ULSD is fired. [P 053-0049 Part IV.A.1.c]

*d. Reporting Requirements*

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- i. The Permittee shall submit to the commissioner on forms furnished or prescribed by him a report summarizing opacity monitoring data for the preceding three months. Such reports shall be due not later than 30 days following the end of each calendar quarter. [RCSA 22a-174-4(d)(5)]

#### **5. Start-Up, Shutdown, & Malfunction Limits**

##### *a. Limitation or Restriction*

- i. The hours of start-up and shutdown, in which NO<sub>x</sub> emissions exceed 9 ppmvd, shall not exceed 250 hours in any consecutive 12 month period. [P 053-0049 Part II.B.4]
  - (A) Turbine start-up shall be defined as that period of time from which initiation of combustion turbine firing until the unit reaches steady-state operation. This period shall not exceed 60 minutes for a hot start, nor 180 minutes for a cold start. A cold start shall be defined as start-up when the turbine has been down for more than 24 hours. [P 053-0049 Part II.B.4]
  - (B) Shutdown shall be defined as that period of time from the initial lowering of the turbine output to the cessation of turbine operation. This period shall not exceed 30 minutes. [P 053-0049 Part II.B.2]

##### *b. Monitoring Requirements*

- i. The Permittee shall monitor the hours of start-up, shutdown and malfunction in the operation of the FT-8 Stationary Gas Turbine Cogeneration System using the CEM system to continuously count the hours. [RCSA §22a-174-33(j)(1)(K)(ii)] Malfunction is defined in 40 CFR §60.2. [P 053-0049 Part II.B.3]

##### *c. Record Keeping Requirements*

- i. The Permittee shall make and keep records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of the FT-8 Stationary Gas Turbine Cogeneration System; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative. [40 CFR §60.7(b) and P 053-0049 Part IV.B.4]

##### *d. Reporting Requirements*

- i. The Permittee shall report the hours of start-up, shutdown and malfunction, in which NO<sub>x</sub> emissions exceed 9 ppmvd, for the FT-8 Stationary Gas Turbine Cogeneration System in the Quarterly Report to the commissioner. [RCSA §22a-174-4(d)(1)]

#### **6. Nitrogen Oxides**

##### *a. Limitation or Restriction*

- i. The Permittee shall not exceed the NO<sub>x</sub> emissions limit of 9 ppmvd @15% O<sub>2</sub> for the FT-8 Stationary Gas Turbine Cogeneration System. [P 053-0049 Part III.A]
- ii. During periods of start-up, shutdown and malfunction, NO<sub>x</sub> emissions shall not exceed 50 ppmvd (corrected to 15% O<sub>2</sub>), based on the duration of the event (the minimum is a one-hour average). [P 053-0049 Part II.B.5]

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#### *b. Monitoring Requirements*

- i. The Permittee shall monitor the NO<sub>x</sub> emissions from the FT-8 Stationary Gas Turbine Cogeneration System using a continuous emissions monitor. All CEM equipment shall be operated in compliance with RCSA §22a-174-4. Continuous emissions monitoring shall be required during all periods of operation, including periods of start-up, shutdown, malfunctions or emergency conditions. [P 053-0049 Part IV.A]

#### *c. Record Keeping Requirements*

- i. The Permittee shall make and keep records of the NO<sub>x</sub> emissions from the FT-8 Stationary Gas Turbine Cogeneration System. All data will be corrected to a dry basis and 15% O<sub>2</sub>. [P 053-0049 Part IV.A.1.a]

#### *d. Reporting Requirements*

- i. The Permittee shall report the NO<sub>x</sub> emissions from the FT-8 Stationary Gas Turbine Cogeneration System in the annual emission statement. [RCSA §22a-174-4(d)(1)]
- ii. The Permittee shall submit reports of excess emissions and monitor downtime to the Administrator/commissioner, in accordance with 40 CFR §60.7(c). For the purpose of reports required under §60.7(c), periods of excess emissions that shall be reported are defined in 40 CFR §60.334(j). The Permittee shall meet this requirement by submitting the Quarterly Report to the commissioner.

### **7. Work Practice Standards**

#### *a. Limitation or Restriction*

- i. The Permittee shall inspect the SCR catalyst once per year, at a minimum, and replace it as required through the monitoring of the catalyst test pieces. [P 053-0049 Part IV.A.4]
- ii. The Permittee shall properly operate and maintain this equipment in accordance with the manufacturer's specifications and written recommendations. [P 053-0049 Part V.A]
- iii. The Permittee shall properly operate the control equipment at all times that this turbine is in operation and emitting air pollutants. [P 053-0049 Part V.B]

#### *b. Record Keeping Requirements*

- i. The Permittee shall keep records of the inspection of the SCR catalyst. The records shall include the name of the person inspecting the SCR catalyst, the date of inspection, the results of the inspection and the date the catalyst is replaced. [P 053-0049 Part IV.B.3]
- ii. The Permittee shall keep records of all manufacturer's specifications and written recommendations and shall make and keep records demonstrating that the turbine and control equipment are operated in accordance with such specifications and recommendations. [RCSA §22a-174-4(d)(1)]
- iii. The Permittee shall make and keep records of the hours of operation of the turbine and control equipment to ensure they are operating concurrently. [RCSA §22a-174-4(d)(1)]

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#### *c. Reporting Requirements*

- i. The Permittee shall keep all records required by this section for a period of 5 years and shall provide such records upon request. [RCSA §22a-174-4(d)(1)]

### **8. CAIR NO<sub>x</sub> Ozone Season Trading**

#### *a. Limitation or Restriction*

The FT-8 Stationary Gas Turbine Cogeneration System is a CAIR NO<sub>x</sub> Ozone season unit and therefore is subject to RCSA Section 22a-174-22c. The unit shall comply with all applicable requirements stated in RCSA Section 22a-174-22c and the standard requirements of the CAIR permit application (SIMS No. 201207368). [RCSA §22a-174-22c]

### **C. GROUPED EMISSION UNIT 3 (GEU-3) – Vitiated Inlet Air Heaters X-7 & X-8**

#### **1. Fuel Usage**

##### *a. Limitation or Restriction*

There are no operating limitations on fuel usage for the Vitiated Inlet Air Heaters X-7 & X-8. However, there are monitoring, record keeping and reporting requirements.

##### *b. Monitoring Requirements*

- i. The Permittee shall monitor the fuel usage of the Vitiated Inlet Air Heaters X-7 & X-8 using either fuel purchase receipts or a fuel meter. [RCSA §22a-174-33(j)(1)(K)(ii)]

##### *c. Record Keeping Requirements*

- i. The Permittee shall make and keep records of the annual fuel usage of the Vitiated Inlet Air Heaters X-7 & X-8. [RCSA §22a-174-4(d)(1)]

##### *d. Reporting Requirements*

- i. The Permittee shall report annual fuel usage of the Vitiated Inlet Air Heaters X-7 & X-8 in the annual emission statement. [RCSA §22a-174-4(d)(1)]

#### **2. Nitrogen Oxides**

##### *a. Limitation or Restriction*

The Permittee shall meet the nitrogen oxide emission limitation for the Vitiated Inlet Air Heaters X-7 & X-8 of 700 ppmvd. [RCSA §22a-174-22(e)(2)(G)]

##### *b. Monitoring Requirements*

- i. The Permittee shall conduct an emission test of the Vitiated Inlet Air Heaters X-7 & X-8 to demonstrate compliance with RCSA §22a-174-22. Each such emission test shall be conducted in accordance with RCSA §22a-174-5. Compliance with the emission limitations of RCSA §22a-174-22 shall be determined based on the average of three one-hour tests, each performed over a consecutive

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60-minute period. Any analysis of nitrogen content conducted as part of such emission testing shall be in accordance with Method D-3228 of the American Society for the Testing of Materials. If the commissioner determines that three one-hour tests are not reasonable given the location, configuration or operating conditions of a stationary source, the commissioner may approve testing where compliance with the emission limitations of this section shall be determined based on the average of four 15-minute tests, each performed over a consecutive 15-minute period. Any owner or operator of a stationary source who has not installed and operated a continuous emissions monitor at such source shall conduct emission testing once every five years from the date of the previous test or five years from the date the previous test was due, whichever is earlier. [RCSA §22a-174-22(k)(1)]

- ii. The Permittee shall demonstrate compliance with emission limitations of RCSA §22a-174-22 using sampling and analytical procedures approved under 40 CFR 60, Appendix A, or under procedures in RCSA §22a-174-5(d). Sampling shall be conducted when the source is at normal operating temperature and, unless allowed otherwise by the commissioner in a permit or order, is operating at or above ninety percent (90%) of maximum capacity for a fuel-burning source. [RCSA §22a-174-22(k)(2)]

#### *c. Record Keeping Requirements*

- i. The Permittee shall keep the following records [RCSA §22a-174-22(l)(1)(D), (E), (H) & (J)]:
  - (A) Records of all tune-ups, repairs, replacement of parts and other maintenance;
  - (B) Copies of all documents submitted to the commissioner pursuant to RCSA §22a-174-22;
  - (C) Records of the dates, times, and places of all emission testing required by this section, the persons performing the measurements, the testing methods used, the operating conditions at the time of testing, and the results of such testing; and
  - (D) Any other records or reports required by an order or permit issued by the commissioner pursuant to RCSA §22a-174-22.
- ii. The Permittee shall retain all records and reports produced pursuant to the requirements of RCSA §22a-174-22 for five years. Such records and reports shall be available for inspection at reasonable hours by the commissioner or the Administrator. Such records and reports shall be retained at the source, unless the commissioner approves in writing the use of another location in the State. [RCSA §22a-174-22(l)(5)]

#### *d. Reporting Requirements*

- i. Within 30 days of the completion of emission tests conducted under the requirements of RCSA §22a-174-22(k)(1), the Permittee shall submit a written report of the results of such testing to the commissioner. [RCSA §22a-174-22(l)(2)]
- ii. On or before April 15 of each year, the Permittee shall submit a report on NO<sub>x</sub> emissions from such source, on a form provided by the commissioner. [RCSA §22a-174-22(l)(6)] The Permittee shall comply with this requirement by reporting NO<sub>x</sub> emissions for this emission unit in the annual emissions statement.

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#### D. GROUPED EMISSION UNIT 4 (GEU-4) – Emergency Engines Subject to RCSA §22a-174-3b(e)

##### 1. Hours of Operation

###### a. Limitation or Restriction

The Permittee shall not cause or allow the emergency engines to operate except during periods of testing and scheduled maintenance or during an emergency and unless operation of such engine shall not exceed 300 hours during any 12 month rolling aggregate. [RCSA §22a-174-3b(e)(2)(C)]

###### b. Monitoring Requirements

i. The Permittee shall monitor hours of operation of the emergency engines using log entries of the monthly hours run. [RCSA §22a-174-33(j)(1)(K)(ii)]

###### c. Record Keeping Requirements

i. The Permittee shall make and maintain records of the hours of operation of the emergency engines for each month and 12 month rolling aggregate. [RCSA §22a-174-3b(e)(4)]

###### d. Reporting Requirements

i. The Permittee shall report the annual hours of operation of the emergency engines in the annual emission statement. [RCSA §22a-174-4(d)(1)]

##### 2. Sulfur Content

###### a. Limitation or Restriction

The Permittee shall not cause or allow the diesel fired emergency engines to operate except during periods of testing; scheduled maintenance [RCSA §22a-174-22(a)(3)]; to provide power when there is an interruption of power from the electricity supplier during construction, facility maintenance, or repairs [RCSA §22-174-22(c)]; or during an emergency and unless any nongaseous fuel consumed by such engine shall not exceed the sulfur content of 0.0015% by weight. [RCSA §22a-174-3b(e)(2)(D)]

###### b. Record Keeping Requirements

i. The Permittee shall keep any of the following records to demonstrate compliance of the sulfur content of fuel used in the diesel fired emergency engines [RCSA §22a-174-3b(h)]:

- (A) A fuel certification for a delivery of nongaseous fuel from a bulk petroleum provider;
- (B) A sales receipt for the sale of motor vehicle diesel fuel from a retail location; or
- (C) A copy of a current contract with the fuel supplier supplying the fuel used by the equipment that includes the applicable sulfur content of nongaseous fuel as a condition of each shipment.

###### c. Reporting Requirements

i. The Permittee shall report the sulfur content for the fuel burned in the diesel fired emergency engines in the annual emission statement. [RCSA §22a-174-4(d)(1)]



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#### 3. Fuel Usage

##### a. Limitation or Restriction

There are no operating limitations on fuel usage for the emergency engines. However, there are monitoring, record keeping and reporting requirements.

##### b. Monitoring Requirements

- i. The Permittee shall monitor the fuel usage of the emergency engines, using either fuel purchase receipts or a fuel meter or by multiplying the hour meter reading by the maximum firing rate of the engine. [RCSA §22a-174-33(j)(1)(K)(ii)]

##### c. Record Keeping Requirements

- i. The Permittee shall make and keep records of the annual fuel usage of the emergency engines. [RCSA §22a-174-4(d)(1)]

##### d. Reporting Requirements

- i. The Permittee shall report annual fuel usage of the emergency engines in the annual emission statement. [RCSA §22a-174-4(d)(1)]

#### 4. Particulate Matter

##### a. Limitation or Restriction

- i. **(FEDERALLY ENFORCEABLE SIP REQUIREMENT)** The Permittee shall not cause or permit the emission from fuel burning equipment of particulate matter in excess of the limitations listed in table 18-D-1. For all other sources that burn all fuels except residual oil, the limit is 0.20 pounds of particulate matter per MMBTU of heat input. [Regulation approved by EPA on 9-23-1982, RCSA §22a-174-18(d)(1)]
- ii. **(STATE-ONLY REQUIREMENT)** The Permittee of any stationary reciprocating internal combustion engine that is an emergency engine, as defined in RCSA §22a-174-22(a)(2) and has a maximum continuous brake horsepower output rating, as specified by the manufacturer, greater than or equal to 175 bhp shall not be subject to the particulate matter emissions standards of RCSA §22a-174-18(e). [Current Regulation submitted to EPA on 12-1-2004, RCSA §22a-174-18(j)(6)]
- iii. **(STATE-ONLY REQUIREMENT)** The Permittee of any stationary reciprocating internal combustion engine with a maximum continuous brake horsepower output rating, as specified by the manufacturer, of less than 175 bhp shall not be subject to requirements of RCSA §22a-174-18(e). [Current Regulation submitted to EPA on 12-1-2004, RCSA §22a-174-18(j)(7)]

##### b. Record Keeping Requirements

- i. The Permittee shall make and keep records to demonstrate compliance with the particulate matter emission standard for the emergency engines. [RCSA §22a-174-4(d)(1)]

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#### *c. Reporting Requirements*

- i. The Permittee shall make records of particulate matter emissions for each emergency engine available to the commissioner upon request. [RCSA §22a-174-4(d)(1)]

#### **5. Nitrogen Oxides**

##### *a. Limitation or Restriction*

- i. RCSA §22a-174-22(d) through (k) shall not apply to an emergency engine provided the operation of an emergency engine for routine, scheduled testing or maintenance on any day for which the commissioner has forecast that ozone levels will be “moderate to unhealthy for sensitive groups,” “unhealthy for sensitive groups,” “unhealthy,” or “very unhealthy is expressly prohibited. [RCSA §22a-174-22(b)(3)]

##### *b. Record Keeping Requirements*

- i. The Permittee shall keep the following records [RCSA §22a-174-22(l)(1)(A), (D), (E) & (J)]:
  - (A) Daily record of operating hours of such engine, identifying the operating hours of emergency and non-emergency use;
  - (B) Records of all tune-ups, repairs, replacement of parts and other maintenance;
  - (C) Copies of all documents submitted to the commissioner pursuant to RCSA §22a-174-22; and
  - (D) Any other records or reports required by an order or permit issued by the commissioner pursuant to RCSA §22a-174-22.
- ii. The Permittee shall retain all records and reports produced pursuant to the requirements of RCSA §22a-174-22 for five years. Such records and reports shall be available for inspection at reasonable hours by the commissioner or the Administrator. Such records and reports shall be retained at the source, unless the commissioner approves in writing the use of another location in the State. [RCSA §22a-174-22(l)(5)]

##### *c. Reporting Requirements*

- i. On or before April 15 of each year, the Permittee shall submit a report on NO<sub>x</sub> emissions from such source, on a form provided by the commissioner. [RCSA §22a-174-22(l)(6)] The Permittee shall comply with this requirement by reporting NO<sub>x</sub> emissions for this emission unit in the annual emissions statement.

#### **E. GROUPED EMISSION UNITS 4 & 5 – Emergency Engines Subject to 40 CFR 60 Subpart IIII**

##### **1. Criteria Pollutants**

##### *a. Limitation or Restriction*

- i. The Permittee shall not cause or allow the emergency engines to exceed the following emissions limitations [40 CFR §60.4205(c)]:

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(A) NO<sub>x</sub> + NMHC – 4.0 g/kW-hr

(B) PM – 0.20 g/kW-hr

*b. Record Keeping Requirements*

i. The Permittee shall comply with the emission limitations in Section III.E.1.a.i. of this Title V Permit according to the following [40 CFR §60.4211(b)]:

(A) Purchasing an engine certified according to 40 CFR 89 or 40 CFR 94, as applicable for the same year and maximum engine power. The engine must be installed and configured according to the manufacturer's specifications. The Permittee shall make and keep records of such purchase. [RCSA §22a-174-4(d)(1)]

(B) Keeping records of engine manufacturer data indicating compliance with the standards.

*c. Reporting Requirements*

i. The Permittee shall keep the records required by this section for the life of each engine and shall provide them upon request. [RCSA §22a-174-4(d)(1)]

## **2. Fuel Sulfur Content**

*a. Limitation or Restriction*

i. The Permittee shall not combust fuel with a fuel sulfur content greater than 15 ppm in the emergency engines subject to NSPS Subpart IIII. [40 CFR §60.4207(b)]

*b. Record Keeping Requirements*

i. The Permittee shall keep any of the following records to demonstrate compliance with the fuel sulfur content limitation of the fuel used in each emergency engine [RCSA §22a-174-33(j)(1)(K)(ii)]:

(A) A fuel certification for a delivery of nongaseous fuel from a bulk petroleum provider;

(B) A sales receipt for the sale of motor vehicle diesel fuel from a retail location; or

(C) A copy of a current contract with the fuel supplier supplying the fuel used by the equipment that includes the applicable sulfur content of nongaseous fuel as a condition of each shipment.

ii. The Permittee shall keep a record of each engine manufacturer's certification of their fire pump to the emissions standards in 40 CFR 60 Subpart IIII Table 4 for the same model year and NFPA nameplate power. [40 CFR §60.4202(d)]

*c. Reporting Requirements*

i. The Permittee shall keep the records required by this section for the life of each engine and shall provide them upon request. [RCSA §22a-174-4(d)(1)]

## Section III: Applicable Requirements and Compliance Demonstration

### 3. Annual Hours of Operation

#### a. Limitation or Restriction

- i. The Permittee shall not cause or allow each emergency engine to operate except during periods of testing and scheduled maintenance or during an emergency and unless operation of such engine shall not exceed 300 hours during any 12-month rolling aggregate. [RCSA §22a-174-3b(e)(2)(C)]
- ii. Each emergency engine may be operated for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State, or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hours per year. [40 CFR §60.4211(f)]

#### b. Record Keeping Requirements

- i. The Permittee shall make and maintain records of the hours of operation of each emergency engine for each month and 12-month rolling aggregate. Each records shall indicate the hours of operation for maintenance checks and readiness testing and the hours of operation in emergency situations [RCSA §22a-174-3b(e)(4) & §22a-174-33(j)(1)(K)(ii)]

#### c. Reporting Requirements

- i. The Permittee shall report the annual hours of operation for each emergency engine in the annual emission statement. [RCSA §22a-174-4(d)(1)]

### F. GROUPED EMISSION UNITS 4 & 5 (GEU-4 & 5) – Emergency Engines Subject to 40 CFR 63 Subpart ZZZZ

The following requirements shall not apply to Building M Generator BT # 474914, with the exception of Part III.F.1.a.x. of this Title V permit. [40 CFR §§63.6590(a)(1)(i) and (b)(3)(iii)]

#### 1. Work Practice Standards

##### a. Limitation or Restriction

- i. The Permittee shall change the oil and filter on each emergency engine every 500 hours of operation or annually, whichever comes first. [40 CFR §63.6602, Table 2c(1)(a)]
- ii. The Permittee shall inspect the spark plugs on each spark ignition emergency engine every 1,000 hours of operation or annually, whichever comes first, and replace as necessary [40 CFR §63.6602, Table 2c(6)(b)]
- iii. The Permittee shall inspect all hoses and belts on each emergency engine every 500 hours of operation or annually, whichever comes first, and replace as necessary. [40 CFR §63.6602, Table 2c(1)(c)]
- iv. The Permittee shall minimize each compression ignition engine's time spent at idle and minimize each compression ignition engine's startup time at startup to a period needed for appropriate and safe loading of each engine, not to exceed 30 minutes, after which time the non-startup emissions limitations apply. [40 CFR §63.6602, Table 2c(1)]

### **Section III: Applicable Requirements and Compliance Demonstration**

- v. If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the work practice requirements on the schedule required in Sections III.F.1.a.i.-iii. of this Title V permit, or if performing the work practice on the required schedule would otherwise pose an unacceptable risk under federal, state, or local law, the work practice can be delayed until the emergency is over or the unacceptable risk under federal, state, or local law has abated. The work practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under federal, state, or local law has abated. [40 CFR §63.6602, Table 2c, Footnote 1]
- vi. The Permittee shall, at all times, operate and maintain each emergency engine, including associated air pollution control and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. [40 CFR §63.6605(b)]
- vii. The Permittee shall operate and maintain each emergency engine according to the manufacturer's emission-related written instructions or develop a maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. [40 CFR §63.6625(e)]
- viii. For compression ignition engines, the Permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Section III.G.1.a.i. of this Title V permit. The oil analysis must be performed every 500 hours of operation or annually, whichever comes first. The analysis must, at a minimum, analyze the following three parameters: Total Base Number, viscosity, and percent water content. Upon analysis, if the Total Base Number is less than 30 percent of the Total Base Number of the oil when new, the viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new, or the percent water content (by volume) is greater than 0.5, then the Permittee shall change the oil within two business days of receiving the results of the analysis. If the results of the oil analysis indicate that these thresholds are not exceeded, the Permittee is not required to change the oil. If any emergency engine is not in operation when the results of the oil analysis are received, the Permittee shall change the oil within two business days or before commencing operation, whichever is later. This analysis program must be part of the maintenance plan for the emergency engines. [40 CFR §63.6625(i)]
- ix. In addition to any restrictions placed on the hours of operation for each engine by RSCA §22a-174-3b or another applicable requirement, the Permittee shall operate each emergency engine according to the following requirements. If the Permittee does not operate each engine in accordance with the following requirements, the engine will not be considered an emergency engine under 40 CFR 60 Subpart ZZZZ and must meet all of the requirements for non-emergency engines. [40 CFR 63.6640(f)]:
  - (A) There is no time limit on the use of each emergency engine in emergency situations.
  - (B) The Permittee may operate each emergency engine for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by Section III.D.1.a. of this Title V permit is included as part of the 100 hours allowed by this paragraph. The 100 hours per year shall be included in the 300 hour per year for units subject to the operating restriction of RSCA §22a-174-3b(e).
    - (1) Each emergency engine may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional

### Section III: Applicable Requirements and Compliance Demonstration

hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of the emergency engine beyond 100 hours per calendar year. [40 CFR §63.6640(f)(2)(i)]

- (2) Each emergency engine may be operated for periods where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency. [40 CFR §63.6640(f)(2)(iii)]
- (C) Each emergency engine may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in Section III.D.1.a. of this Title V permit. The 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity. [40 CFR §63.6640(f)(3)]
- x. The Permittee shall not cause or allow the Building M generator BT #474914 to be operated for more than 15 hours per calendar year for purposes specified in 40 CFR §63.6640(f)(2)(ii) and (iii). [40 CFR §63.6590(b)(3)(iii)]

#### *b. Monitoring Requirements*

- i. The Permittee shall install a non-resettable hour meter on each emergency engine. [40 CFR §63.6625(f)]

#### *c. Record Keeping Requirements*

- i. The Permittee shall make and keep records of the parameters that are analyzed as part of the oil analysis program, the results of any such analysis, and the oil changes for each emergency engine. [40 CFR §63.6625(i)]
- ii. The Permittee shall keep a copy of each notification and report submitted to comply with 40 CFR 63 Subpart ZZZZ, including all documentation supporting any Initial Notification of Compliance Status submitted. [40 CFR §63.6655(a)(1)]
- iii. The Permittee shall make and keep records of the occurrence and duration of any malfunction in operation. [40 CFR §63.6655(a)(2)]
- iv. The Permittee shall make and keep records of any required performance tests and performance evaluations. [40 CFR 63.6655(a)(3)]
- v. The Permittee shall make and keep records of actions taken during periods of malfunction to minimize emissions in accordance with Section III.F.1.a.vi. of this Title V permit, including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. [40 CFR §63.6655(a)(5)]
- vi. The Permittee shall make and keep records to show continuous compliance with each applicable work practice standard in 40 CFR 63 Subpart ZZZZ, Table 6. [40 CFR §63.6655(d)]

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- vii. The Permittee shall make and keep records of the maintenance conducted on each emergency engine in order to demonstrate that the engine was operated and maintained according to the Permittee's maintenance plan. [40 CFR §63.6655(e)]
- viii. The Permittee shall make and keep records of the hours of operation that is recorded through the non-resettable hour meter. The Permittee shall document how many hours are spent for emergency operations, including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engine is operated for the purpose of a deviation in voltage or frequency, the Permittee shall make and keep records of the notification of the emergency situation, and the date, start time, and end time of engine operation for this purpose. [40 CFR §63.6655(f)]

#### *d. Reporting Requirements*

- i. The Permittee shall report to the Administrator each instance in which a deviation from a work practice standard in Section III.F.1.a. of this Title V permit occurs. [40 CFR §63.6640(b)]
- ii. The Permittee shall report any failure to perform the engine's work practice on the schedule required and the Federal, State or local law under which the risk was deemed unacceptable. [40 CFR §63.6602, Table 2c, Footnote 1]
- iii. For each deviation from a work practice standard in Section III.F.1.a. of this Title V permit, the Compliance report must contain the following information [40 CFR §63.6650(d)]:
  - (A) The Company name and address
  - (B) A statement by a responsible official with that official's name, title, and signature, certifying the accuracy of the content of the report.
  - (C) Date of report and beginning and ending dates of the reporting period.
  - (D) If a malfunction occurred during the reporting period, the compliance report must include the number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by the Permittee during a malfunction to minimize emissions in accordance with Section III.E.1.a.vi. of this Title V permit, including actions taken to correct a malfunction.
  - (E) The total operating time of the emergency engine at which the deviation occurred during the reporting period.
  - (F) Information on the number duration, and cause of deviations (including unknown cause, if applicable) as applicable and the corrective action taken.

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#### G. GROUPED EMISSION UNIT 11 (GEU-11) – Spray Booths

##### 1. Coating Usage

###### a. *Limitation or Restriction*

###### i. Type of Coatings Allowed:

- (A) Specialty coatings as defined by the National Emission Standards for Aerospace Manufacturing and Rework Facilities, 40 CFR 63, Subpart GG. Individual specialty coatings are defined in Subpart GG Appendix A and in the Control Techniques Guideline: Control of Volatile Organic Compound Emissions from Coating Operations at Aerospace Manufacturing and Rework Operations (Aerospace CTG), Appendix A and B (EPA 453/R-97-004).
  - (B) Research and Development, Department of Defense classified and other exempt coatings. [P 053-0124 & 133 Part II.A.1 and P 053-0055, 65, 66, 121 & 122 Part II.A.1.a & b]
  - (C) Support equipment coatings (Not subject to 40 CFR 63, Subpart GG) [P 053-0055, 65, 66, 121 & 122 Part II.A.1.c]
- ii. Maximum VOC Content of Specialty Coatings as Applied (excluding water and exempt VOCs): Coatings shall not exceed the VOC content limits specified in section B.3(a)(1) of the Aerospace CTG. [P 053-0055, 65, 66, 121, 122, 124 & 133 Part II.A.2]

###### b. *Monitoring Requirements*

- i. The Permittee shall monitor the usage of coatings, paints, thinners and cleaners used in the Overhaul & Repair Operations booths, the Building E booths, the Hollow Fan Blade booth, the CANMC STC PB01 booth, the MERL STC PB booth and the CANMC STC PB02 booth through records of material usage. [RCSA §22a-174-33(j)(1)(K)(ii)]

###### c. *Record Keeping Requirements*

- i. The Permittee shall record the information specified in 40 CFR 63.752 for the Overhaul & Repair Operations booths, the Building E booths, the Hollow Fan Blade booth, the CANMC STC PB01 booth, the MERL STC PB booth and the CANMC STC PB02 booth. [P 053-0055, 65, 66, 121, 122, 124 & 133 Part III.A.1]
- ii. The Permittee shall maintain daily and monthly records of all coatings and spray gun cleaners used in the Overhaul & Repair Operations booths, the Building E booths, the Hollow Fan Blade booth, the CANMC STC PB01 booth, the MERL STC PB booth and the CANMC STC PB02 booth. Such records shall contain the following information [P 053-0055, 65, 66, 121, 122, 124 & 133 Part III.A.2]:
- (A) Date of application;
  - (B) Name of coating or cleaner used;
  - (C) MSDS or the manufacturer's technical data sheet;
  - (D) Density (lb/gal);



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- (E) VOC content by weight (lb VOC/gal), as applied;
- (F) Water, exempt solvent, and non-volatile content by weight (lb/gal), as applied; and
- (G) Quantity of each coating and cleaner used (pounds).

#### *d. Reporting Requirements*

- i. The Permittee shall report annual coating and spray gun cleaner usage for the Overhaul & Repair Operations booths, the Building E booths, the Hollow Fan Blade booth, the CANMC STC PB01 booth, the MERL STC PB booth and the CANMC STC PB02 booth in the annual emission statement. [RCSA §22a-174-4(d)(1)]

## **2. Allowable VOC and TSP Emission Limits**

### *a. Limitation or Restriction*

- i. The allowable emission limits for the Overhaul & Repair Operations booths are [P 053-0055 Part V.A]:
  - (A) PM-10: 0.70 lb/hr, and 0.12 tons/year
  - (B) VOC: 12 lb/hr, 12 lb/day, and 2.2 tons/year
- ii. The allowable emission limits for each of the Building E booths are [P 053-0065 & 66 Part V.A]:
  - (A) PM-10: 1.53 lb/day, and 0.28 tons/year
  - (B) VOC: 8 lb/day, and 1.5 tons/year
- iii. The allowable emission limits for the Hollow Fan Blade booth are: [P 053-0121 Part V.A]
  - (A) PM-10: 0.067 lb/hr, and 0.007 tons/year
  - (B) VOC: 7.24 lb/hr, and 2.17 tons/year
- iv. The allowable emission limits for the CANMC STC PB01 booth are: [P 053-0122 Part V.A]
  - (A) PM-10: 0.006 lb/hr, and 0.002 tons/year
  - (B) VOC: 29.86 lb/hr, and 0.119 tons/year
- v. The allowable emission limits for the MERL STC PB booth are: [P 053-0124 Part II.C.1]
  - (A) TSP: 0.022 lb/hr, and 0.011 tons/year
  - (B) VOC: 59.72 lb/hr, and 14.93 tons/year
- vi. The allowable emission limits for the CANMC STC PB02 booth are: [P 053-0133 Part II.C.1]
  - (A) TSP: 0.00556 lb/hr and 0.50 tons/year

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(B) VOC: 29.86 lb/hr, and 0.50 tons/year

*b. Monitoring Requirements*

- i. The Permittee shall monitor the VOC and TSP emissions for the Overhaul & Repair Operations booths, the Building E booths, the Hollow Fan Blade booth, the CANMC STC PB01 booth, the MERL STC PB booth and the CANMC STC PB02 booth through records of material usage. [RCSA §22a-174-33(j)(1)(K)(ii)]

*c. Record Keeping Requirements*

- i. The Permittee shall make and keep records of the daily, monthly and consecutive 12-month VOC and TSP emissions for the Overhaul & Repair Operations booths, the Building E booths, the Hollow Fan Blade booth, the CANMC STC PB01 booth, the MERL STC PB booth and the CANMC STC PB02 booth. The consecutive 12 month VOC and TSP emissions shall be determined by adding the current month's VOC and TSP emissions to that of the previous 11 months. The Permittee shall record these calculations monthly. [P 053-0124 & 133 Part III.A.2 and P 053-0055, 65, 66, 121 & 122 Part III.A.4]

*d. Reporting Requirements*

- i. The Permittee shall report annual VOC and TSP emissions for the Overhaul & Repair Operations booths, the Building E booths, the Hollow Fan Blade booth, the CANMC STC PB01 booth, the MERL STC PB booth and the CANMC STC PB02 booth in the annual emission statement. [RCSA §22a-174-4(d)(1)]

### **3. Work Practice Standards**

*a. Limitation or Restriction*

- i. The Permittee shall comply with all supplied warranties, recommendations and stipulations set by the manufacturer for maintaining and operating the spray booth, spray guns, and filter media. [P 053-0124 & 133 Part II.B.1 and P 053-0055, 65, 66, 121, 122 & 132 Part IV.A]
- ii. The Permittee shall ensure that all control equipment specified by an NSR permit is properly installed and in good operating condition before the spray booth is operated. [P 053-0124 & 133 Part II.B.2 and P 053-0055, 65, 66, 121, 122 & 132 Part IV.B]

*b. Record Keeping Requirements*

- i. The Permittee shall keep records of any maintenance performed on the spray booth, spray guns, filter media, or control equipment. [RCSA §22a-174-4(d)(1)]

*c. Reporting Requirements*

- i. The Permittee shall keep all records required by this section for a period of 5 years and shall provide such records upon request. [RCSA §22a-174-4(d)(1)]

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#### H. GROUPED EMISSION UNITS 11 & 12 (GEU-11 & GEU-12) – Spray Booths

##### 1. Work Practice Standards

###### a. Limitation or Restriction

- i. The Permittee shall clean spray guns using one or more of the techniques, or their equivalent, specified in 40 CFR §63.744(c)(1) through (c)(4). Spray gun cleaning operations using cleaning solvent solutions that contain HAP and VOC below the de minimis levels specified in 40 CFR §63.741(f) are exempt from the requirements in 40 CFR §63.744(c)(1) through (c)(4). [40 CFR §63.744(c)]
  - (A) Enclosed system. Clean the spray gun in an enclosed system that is closed at all times except when inserting or removing the spray gun. Cleaning shall consist of forcing the solvent through the gun.
  - (B) Nonatomized cleaning. Clean the spray gun by placing cleaning solvent in the pressure pot and forcing it through the gun with the atomizing cap in place. No atomizing air is to be used. Direct the cleaning solvent from the spray gun into a vat, drum, or other waste container that is closed when not in use.
  - (C) Disassembled spray gun cleaning. Disassemble the spray gun and clean the components by hand in a vat, which shall remain closed at all times except when in use. Alternatively, soak the components in a vat, which shall remain closed during the soaking period and when not inserting or removing components.
  - (D) Atomizing cleaning. Clean the spray gun by forcing the cleaning solution through the gun and direct the resulting atomized spray into a waste container that is fitted with a device designed to capture the atomized cleaning solvent emissions.
  - (E) Cleaning of the nozzle tips of automated spray equipment systems, except for robotic systems that can be programmed to spray into a closed container, shall be exempt from the requirements of 40 CFR §63.744(c).

###### b. Monitoring Requirements

- i. The Permittee, using an enclosed spray gun cleaner under 40 CFR §63.744(c)(1), shall visually inspect the seals and all other potential sources of leaks associated with each enclosed gun spray cleaner system at least once per month. Each inspection shall occur while the system is in operation [40 CFR §63.751(a)]

###### c. Record Keeping Requirements

- i. The Permittee shall record the following information for the spray gun cleaning operation: [40 CFR §63.752(b)]
  - (A) The name, vapor pressure, and documentation showing the organic HAP constituents of each cleaning solvent used for affected cleaning operations at the facility;

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- (B) A record of all leaks from enclosed spray gun cleaners identified pursuant to 40 CFR §63.751(a) that includes for each leak found: Source identification; Date leak was discovered; and Date leak was repaired.

#### *d. Reporting Requirements*

- i. The Permittee shall submit semiannual reports for the spray gun cleaning operation occurring every six months from the date of notification of compliance status that identify: [40 CFR §63.753(b)]
  - (A) Any instance where a noncompliant spray gun cleaning method is used;
  - (B) Any instance where a leaking enclosed spray gun cleaner remains unrepaired and in use for more than 15 days; and
  - (C) If the operations have been in compliance for the semiannual period, a statement that the cleaning operations have been in compliance with the applicable standards. Sources shall also submit a statement of compliance signed by a responsible company official certifying that the facility is in compliance with all applicable requirements.

### **I. GROUPED EMISSIONS UNIT 14 (EU-14) – Cold Cleaning Units**

#### **1. Solvent Usage**

##### *a. Limitation or Restriction*

- i. The Permittee shall meet the following requirements for any cold cleaning unit with an internal volume greater than one liter and using solvents containing greater than five percent VOCs by weight, except as provided in RCSA §22a-174-20(1)(6), (7) or (8) [RCSA §22a-174-20(1)(3)(A) to (I), (K) & (L)]:
  - (A) Equip the cleaning device with a cover that is easily operated with one hand. Unless it is exempted per RCSA §22a-174-20(1)(6). [RCSA §22a-174-20(1)(3)(A)]
  - (B) Equip the cleaning device with an internal rack or equipment for draining cleaned parts so that parts are enclosed under the cover while draining. Such drainage rack or equipment may be external for applications where an internal type cannot fit into the cleaning system. Unless it is exempted per RCSA §22a-174-20(1)(6). [RCSA §22a-174-20(1)(3)(B)]
  - (C) Collect and store waste solvent in closed containers. Closed containers used for storing waste solvent may contain a device that allows pressure relief but does not allow liquid solvent to drain from the container. [RCSA §22a-174-20(1)(3)(C)]
  - (D) Close the cover if parts are not being handled in the cleaner for two minutes or more, or if the device is not in use. Except if it is exempt per RCSA §22a-174-20(1)(6). [RCSA §22a-174-20(1)(3)(D)]
  - (E) Drain the cleaned parts for at least 15 seconds or until dripping ceases, whichever is longer. [RCSA §22a-174-20(1)(3)(E)]

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- (F) If a degreasing solvent spray is used: (i) Supply a degreasing solvent spray that is a solid fluid stream (not a fine, atomized or shower type spray), (ii) maintain a solvent spray pressure that does not exceed ten pounds per square inch as measured at the pump outlet, and (iii) perform spraying within the confines of the cold cleaning unit. Except if it is exempt per RCSA §22a-174-20(1)(7). [RCSA §22a-174-20(1)(3)(F)]
- (G) Minimize the drafts across the top of each cold cleaning unit such that whenever the cover is open the unit is not exposed to drafts greater than 40 meters per minute, as measured between one and two meters upwind, at the same elevation as the tank lip. Except if it is exempt per RCSA §22a-174-20(1)(7). [RCSA §22a-174-20(1)(3)(G)]
- (H) Do not operate the unit upon the occurrence of any visible solvent leak until such leak is repaired. Any leaked solvent or solvent spilled during transfer shall be cleaned immediately, and the wipe rags or other sorbent material used to clean the spilled or leaked solvent shall be immediately stored in covered containers for disposal or recycling. [RCSA §22a-174-20(1)(3)(H)]
- (I) Provide a permanent, conspicuous label on or posted near each unit summarizing the applicable operating requirements. [RCSA §22a-174-20(1)(3)(I)]
- (J) Use only solvent that has a vapor pressure less than or equal to 1.0 mmHg at 20 degrees Celsius. Unless it is exempted per RCSA §22a-174-20(1)(8). [RCSA §22a-174-20(1)(3)(K)]
- (K) Shall not clean sponges, fabric, wood, leather, paper and other absorbent material in a cold cleaning machine. [RCSA §22a-174-20(1)(3)(L)]

#### *b. Record Keeping Requirements*

- i. The Permittee shall make and keep the following records for each solvent used [RCSA §22a-174-20(1)(3)(J)].
  - (A) The type of solvent used, including a description of the solvent and the solvent name,
  - (B) The vapor pressure of the solvent in mmHg measured at 20 degrees Celsius (68 degrees Fahrenheit),
  - (C) The percent VOC content by weight, and
  - (D) The amount of solvent added to each unit on a monthly basis.
- ii. The Permittee shall certify and/or document that the design, operation and work practice standards of RCSA §22a-174-20(1)(3) are adhered to. [RCSA §22a-174-4(d)(1)]

#### *c. Reporting Requirements*

- i. The Permittee shall report annual VOC emissions for the cold cleaning units in the annual emission statement. [RCSA §22a-174-4(d)(1)]

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#### J. EMISSIONS UNIT 16 (EU-16) – AMS HVOF Plasma Spray Booth

##### 1. Coating Usage

###### a. Limitation or Restriction

The maximum annual powder coating usage for the AMS HVOF plasma spray booth is 131,400 lb/year. [P 053-0132 Part II.A.2]

###### b. Monitoring Requirements

- i. The Permittee shall monitor the coating usage in the AMS HVOF plasma spray booth through records of material usage. [RCSA §22a-174-33(j)(1)(K)(ii)]

###### c. Record Keeping Requirements

- i. The Permittee shall make and keep monthly records of all powder coatings used in the AMS HVOF plasma spray booth, such records shall include [P 053-0132 Part III.A.1]:
  - (A) Name of coating used;
  - (B) Quantity of each coating used (lb); and
  - (C) HAP content as applied (lb HAP/lb coating).

###### d. Reporting Requirements

- i. The Permittee shall report annual total coating usage for the AMS HVOF plasma spray booth in the annual emission statement. [RCSA §22a-174-4(d)(1)]

##### 2. PM-10 Emissions

###### a. Limitation or Restriction

Allowable PM-10 emissions from the AMS HVOF plasma spray booth: 0.0023 tons/year. Demonstration of compliance with the PM-10 emission limit shall be demonstrated by material balances from usage data and Material Safety Data Sheets. [P 053-0132 Part II.C.1]

###### b. Monitoring Requirements

- i. The Permittee shall monitor the PM-10 emissions of the AMS HVOF plasma spray booth through records of material usage. [RCSA §22a-174-33(j)(1)(K)(ii)]

###### c. Record Keeping Requirements

- i. The Permittee shall make and keep records of the monthly and consecutive 12 month PM-10 emissions. The consecutive 12-month emissions shall be determined by adding the current month's emissions to that of the previous 11 months. The Permittee shall make these calculations on a monthly basis. [P 053-0132 Part III.A.2]

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#### *d. Reporting Requirements*

- i. The Permittee shall report annual PM-10 emissions for the AMS HVOF plasma spray booth in the annual emission statement. [RCSA §22a-174-4(d)(1)]

### 3. Work Practice Standards

#### *a. Limitation or Restriction*

- i. The Permittee shall comply with all supplied warranties, recommendations and stipulations set by the manufacturer for maintaining and operating the spray booth, spray guns, and filter media. [P 053-0124 & 133 Part II.B.1 and P 053-0055, 65, 66, 121, 122 & 132 Part IV.A]
- ii. The Permittee shall ensure that all control equipment specified by the NSR permits is properly installed and in good operating condition before the spray booth is operated. [P 053-0124 & 133 Part II.B.2 and P 053-0055, 65, 66, 121, 122 & 132 Part IV.B]

#### *b. Record Keeping Requirements*

- i. The Permittee shall keep records of any maintenance performed on the spray booth, spray guns, filter media, or control equipment. [RCSA §22a-174-4(d)(1)]

#### *c. Reporting Requirements*

- i. The Permittee shall keep all records required by this section for a period of 5 years and shall provide such records upon request. [RCSA §22a-174-4(d)(1)]

### K. PREMISES-WIDE GENERAL REQUIREMENTS

#### Premises-Wide General Requirements

1. **Permitting Requirements:** The Permittee shall comply with the procedural requirements for new source review and Title V permitting as set forth in RCSA §22a-174-2a.
2. **Exemptions from Permitting:** The Permittee shall comply with the requirements for exemptions from permitting for construction and operation of emergency engines and surface coating operations as set forth in RCSA §22a-174-3b.
3. **Annual Emission Statements:** The Permittee shall submit annual emission statements requested by the commissioner as set forth in RCSA §22a-174-4(d)(1).
4. **Test Methods:** The Permittee shall comply with methods for sampling, emission testing, sample analysis, and reporting as set forth in RCSA §22a-174-5.
5. **Emergency Episode Procedures:** The Permittee shall comply with the procedures for emergency episodes as set forth in RCSA §22a-174-6.
6. **Reporting of Malfunctioning Control Equipment:** The Permittee shall comply with the reporting requirements of malfunctioning control equipment as set forth in RCSA §22a-174-7.

### Section III: Applicable Requirements and Compliance Demonstration

7. **Prohibition of Air Pollution:** The Permittee shall comply with the requirement to prevent air pollution as set forth in RCSA §22a-174-9.
8. **Public Availability of Information:** The public availability of information shall apply, as set forth in RCSA §22a-174-10.
9. **Prohibition Against Concealment/Circumvention:** The Permittee shall comply with the prohibition against concealment or circumvention as set forth in RCSA §22a-174-11.
10. **Violations and Enforcement:** The Permittee shall not violate or cause the violation of any applicable regulation as set forth in RCSA §22a-174-12.
11. **Variances:** The Permittee may apply to the commissioner for a variance from one or more of the provisions of these regulations as set forth in RCSA §22a-174-13.
12. **No Defense to Nuisance Claim:** The Permittee shall comply with the regulations as set forth in RCSA §22a-174-14.
13. **Severability:** The Permittee shall comply with the severability requirements as set forth in RCSA §22a-174-15.
14. **Responsibility to Comply:** The Permittee shall be responsible to comply with the applicable regulations as set forth in RCSA §22a-174-16.
15. **Particulate Emissions:** The Permittee shall comply with the standards for control of particulate matter and visible emissions as set forth in RCSA §22a-174-18. (Section 18 approved by EPA on 9-23-1982, current Regulation submitted to EPA on 12-1-2004.)
16. **Sulfur Compound Emissions:** The Permittee shall comply with the requirements for control of sulfur compound emissions as set forth in RCSA §22a-174-19.
17. **Organic Compound Emissions:** The Permittee shall comply with the requirements for control of organic compound emissions as set forth in RCSA §22a-174-20.
18. **Nitrogen Oxide Emissions:** The Permittee shall comply with the requirements for control of nitrogen oxide emissions as set forth in RCSA §22a-174-22.
19. **Ambient Air Quality:** The Permittee shall not cause or contribute to a violation of an ambient air quality standard as set forth in RCSA §22a-174-24(b).
20. **Emission Fees:** The Permittee shall pay an emission fee as set forth in RCSA §22a-174-26(d).
21. **VOC RACT:** The Permittee shall comply with the standards for Reasonably Available Control Technology (RACT) for volatile organic compounds as set forth in RCSA §22a-174-32 by complying with the Control Techniques Guideline: Control of Volatile Organic Compound Emissions from Coating Operations at Aerospace Manufacturing and Rework Operations (EPA-453/R-97-004).



### Section III: Applicable Requirements and Compliance Demonstration

- 22. VOC Emissions from Surface Coating Operations:** Premises-wide VOC emissions from all miscellaneous metal and plastic parts surface coating operations shall not exceed 1,666 pounds in any calendar month. The Permittee shall keep records of the coatings and cleaners used, amount of consumption and the VOC emissions on a monthly basis from all miscellaneous metal and plastic parts surface coating operations on the premises. The Permittee shall make total annual VOC emissions from all miscellaneous metal and plastic parts surface coating operations on the premises available to the commissioner upon request. [P 053-0124 & 133 Part IV.B and P 053-0055, 65, 66, 121 & 122 Part VI.B]
- 24. Aerospace NESHAP:** The Permittee shall comply with the National Emission Standards for Hazardous Air Pollutants for Aerospace Manufacturing and Rework Facilities as specified in 40 CFR 63, Subpart GG.
- 25. Asbestos NESHAP:** The Permittee shall make notifications for applicable demolition or renovation activities in accordance with 40 CFR 61 Subpart M.
- 26. Off-Site Waste & Recovery Operation NESHAP:** The Permittee shall keep records that demonstrate that the total annual HAP content in off-site material does not exceed one megagram per year, thereby documenting the facility's exemption from this regulation in accordance with 40 CFR 63 Subpart DD.
- 27. Protection of Stratospheric Ozone:** The Permittee shall comply with the standards for recycling and emissions reduction of products using ozone depleting substances pursuant to 40 CFR Part 82 Subpart F.
- 28. Good Housekeeping Practices:** The Permittee shall comply with the following housekeeping measures for the cleaning operation unless the cleaning solvent used is identified in 40 CFR §63.744 Table 1 or contains HAP and VOC below the de minimis levels specified in 40 CFR §63.741(f) [40 CFR §63.744(a)]:
- a. Place cleaning solvent-laden cloth, paper, or any other absorbent applicators used for cleaning in bags or other closed containers upon completing their use. Ensure that these bags and containers are kept closed at all times except when depositing or removing these materials from the container. Use bags and containers of such design so as to contain the vapors of the cleaning solvent. Cotton tipped swabs used for very small cleaning operations are exempt from this requirement.
  - b. Store fresh and spent cleaning solvents, except semi-aqueous solvent cleaners, used in aerospace cleaning operations in closed containers.
  - c. Conduct the handling and transfer of cleaning solvents to or from enclosed systems, vats, waste containers and other cleaning operation equipment that hold or store fresh or spent cleaning solvents in such a manner that minimizes spills.

**Section IV: Compliance Schedule**

<b>TABLE IV: COMPLIANCE SCHEDULE</b>				
<b>Emissions Unit</b>	<b>Applicable Regulations</b>	<b>Steps Required for Achieving Compliance (Milestones)</b>	<b>Date by which Each Step is to be Completed</b>	<b>Dates for Monitoring, Record Keeping, and Reporting</b>
		<b>No steps are required for achieving compliance at this time.</b>		

## **Section V: State Enforceable Terms and Conditions**

Only the Commissioner of the Department of Energy and Environmental Protection has the authority to enforce the terms, conditions and limitations contained in this section.

### **State Enforceable Terms and Conditions**

- A.** This Title V permit does not relieve the Permittee of the responsibility to conduct, maintain and operate the emissions units in compliance with all applicable requirements of any other Bureau of the Department of Energy and Environmental Protection or any federal, local or other state agency. Nothing in this Title V permit shall relieve the Permittee of other obligations under applicable federal, state and local law.
- B.** Nothing in this Title V permit shall affect the commissioner's authority to institute any proceeding or take any other action to prevent or abate violations of law, prevent or abate pollution, investigate air pollution, recover costs and natural resource damages, and to impose penalties for violations of law, including but not limited to violations of this or any other permit issued to the Permittee by the commissioner.
- C.** Odors: The Permittee shall not cause or permit the emission of any substance or combination of substances which creates or contributes to an odor that constitutes a nuisance beyond the property boundary of the premises as set forth in RCSA §22a-174-23.
- D.** Noise: The Permittee shall operate in compliance with the regulations for the control of noise as set forth in RCSA §§22a-69-1 through 22a-69-7.4, inclusive.
- E.** Hazardous Air Pollutants (HAPs): The Permittee shall operate in compliance with the regulations for the control of HAPs as set forth in RCSA §22a-174-29.
- F.** Open Burning: The Permittee is prohibited from conducting open burning, except as may be allowed by CGS §22a-174(f).
- G.** Fuel Sulfur Content: The Permittee shall not use No. 2 heating oil that exceeds three-tenths of one percent sulfur by weight as set forth in CGS §16a-21a.
- H.** Reporting of emissions of greenhouse gases: In accordance with CGS §22a-200b(e), the Permittee shall report greenhouse gas emissions to the commissioner in a format specified by the commissioner.
- I.** The Permittee shall comply with the requirements for Control of Sulfur Dioxide Emissions from Power Plants and other large stationary sources of air pollution as set forth in RCSA §22a-174-19a.
- J.** The Permittee shall comply with the requirements for Control of Carbon Dioxide Emissions as set forth in RCSA §22a-174-31.

## Section VI: Title V Requirements

The Administrator of the United States Environmental Protection Agency and the Commissioner of the Department of Energy and Environmental Protection have the authority to enforce the terms and conditions contained in this section.

### Title V Requirements

#### A. SUBMITTALS TO THE COMMISSIONER & ADMINISTRATOR

The date of submission to the commissioner of any document required by this Title V permit shall be the date such document is received by the commissioner. The date of any notice by the commissioner under this Title V permit, including, but not limited to notice of approval or disapproval of any document or other action, shall be the date such notice is delivered or the date three days after it is mailed by the commissioner, whichever is earlier. Except as otherwise specified in this Title V permit, the word "day" means calendar day. Any document or action which is required by this Title V permit to be submitted or performed by a date which falls on a Saturday, Sunday or legal holiday shall be submitted or performed by the next business day thereafter.

Any document required to be submitted to the commissioner under this Title V permit shall, unless otherwise specified in writing by the commissioner, be directed to: Office of the Director; Engineering & Enforcement Division; Bureau of Air Management; Department of Energy and Environmental Protection; 79 Elm Street, 5th Floor; Hartford, Connecticut 06106-5127.

Any submittal to the Administrator of the Environmental Protection Agency shall be in a computer-readable format and addressed to: Director, Air Compliance Program; Attn: Air Compliance Clerk; Office of Environmental Stewardship; EPA Region 1; 5 Post Office Square, Suite 100; Mail Code OEP05-02; Boston, Massachusetts 02109-3912.

#### B. CERTIFICATIONS [RCSA §22a-174-33(b)]

In accordance with RCSA §22a-174-33(b), any report or other document required by this Title V permit and any other information submitted to the commissioner or Administrator shall be signed by an individual described in RCSA §22a-174-2a(a), or by a duly authorized representative of such individual. Any individual signing any document pursuant to RCSA §22a-174-33(b) shall examine and be familiar with the information submitted in the document and all attachments thereto, and shall make inquiry of those individuals responsible for obtaining the information to determine that the information is true, accurate, and complete, and shall also sign the following certification as provided in RCSA §22a-174-2a(a)(4):

“I have personally examined and am familiar with the information submitted in this document and all attachments thereto, and I certify that based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information, the submitted information is true, accurate and complete to the best of my knowledge and belief. I understand that any false statement made in the submitted information may be punishable as a criminal offense under Section 22a-175 of the Connecticut General Statutes, under Section 53a-157b of the Connecticut General Statutes, and in accordance with any applicable statute.”

#### C. SIGNATORY RESPONSIBILITY [RCSA §22a-174-2a(a)]

For purposes of signing any Title V-related application, document, report or certification required by RCSA §22a-174-33, any corporation's duly authorized representative may be either a named individual or any individual occupying a named position. Such named individual or individual occupying a named position is a duly authorized representative if such individual is responsible for the overall operation of one or more manufacturing, production or operating facilities subject to RCSA §22a-174-33 and either:

1. The facilities employ more than 250 persons or have gross annual sales or expenditures exceeding 25 million dollars in second quarter 1980 dollars; or

## Section VI: Title V Requirements

### Title V Requirements

2. The delegation of authority to the duly authorized representative has been given in writing by an officer of the corporation in accordance with corporate procedures and the following:
  - i. Such written authorization specifically authorizes a named individual, or a named position, having responsibility for the overall operation of the Title V premises or activity,
  - ii. Such written authorization is submitted to the commissioner and has been approved by the commissioner in advance of such delegation. Such approval does not constitute approval of corporate procedures, and
  - iii. If a duly authorized representative is a named individual in an authorization submitted under subclause ii. of this subparagraph and a different individual is assigned or has assumed the responsibilities of the duly authorized representative, or, if a duly authorized representative is a named position in an authorization submitted under subclause ii. of this subparagraph and a different named position is assigned or has assumed the duties of the duly authorized representative, a new written authorization shall be submitted to the commissioner prior to or together with the submission of any application, document, report or certification signed by such representative.

#### **D. ADDITIONAL INFORMATION** [RCSA §22a-174-33(j)(1)(X), RCSA §22a-174-33(h)(2)]

The Permittee shall submit additional information in writing, at the commissioner's request, within 30 days of receipt of notice from the commissioner or by such other date specified by the commissioner, whichever is earlier, including information to determine whether cause exists for modifying, revoking, reopening, reissuing, or suspending this Title V permit or to determine compliance with this Title V permit.

In addition, the Permittee shall submit information to address any requirements that become applicable to the subject source and shall submit correct, complete, and sufficient information within 15 days of the applicant's becoming aware of any incorrect, incomplete, or insufficient submittal, during the pendency of the application, or any time thereafter, with an explanation for such deficiency and a certification pursuant to RCSA §22a-174-2a(a)(5).

#### **E. MONITORING REPORTS** [RCSA §22a-174-33(o)(1)]

A Permittee, required to perform monitoring pursuant this Title V permit, shall submit to the commissioner, on forms prescribed by the commissioner, written monitoring reports on March 1 and September 1 of each year or on a more frequent schedule if specified in such permit. Such monitoring reports shall include the date and description of each deviation from a permit requirement including, but not limited to:

1. Each deviation caused by upset or control equipment deficiencies; and
2. Each deviation of a permit requirement that has been monitored by the monitoring systems required under this Title V permit, which has occurred since the date of the last monitoring report; and
3. Each deviation caused by a failure of the monitoring system to provide reliable data.

#### **F. PREMISES RECORDS** [RCSA §22a-174-33(o)(2)]

Unless otherwise required by this Title V permit, the Permittee shall make and keep records of all required monitoring data and supporting information for at least five years from the date such data and information were obtained. The Permittee shall make such records available for inspection at the site of the subject source, and shall submit such records to the commissioner upon request. The following information, in addition to required monitoring data, shall be recorded for each permitted source:

1. The type of monitoring or records used to obtain such data, including record keeping;
2. The date, place, and time of sampling or measurement;

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### Title V Requirements

3. The name of the individual who performed the sampling or the measurement and the name of such individual's employer;
4. The date(s) on which analyses of such samples or measurements were performed;
5. The name and address of the entity that performed the analyses;
6. The analytical techniques or methods used for such analyses;
7. The results of such analyses;
8. The operating conditions at the subject source at the time of such sampling or measurement; and
9. All calibration and maintenance records relating to the instrumentation used in such sampling or measurements, all original strip-chart recordings or computer printouts generated by continuous monitoring instrumentation, and copies of all reports required by the subject permit.

#### **G. PROGRESS REPORTS** [RCSA §22a-174-33(q)(1)]

The Permittee shall, on March 1 and September 1 of each year, or on a more frequent schedule if specified in this Title V permit, submit to the commissioner a progress report on forms prescribed by the commissioner, and certified in accordance with RCSA §22a-174-2a(a)(5). Such report shall describe the Permittee's progress in achieving compliance under the compliance plan schedule contained in this Title V permit. Such progress report shall:

1. Identify those obligations under the compliance plan schedule in this Title V permit which the Permittee has met, and the dates on which they were met; and
2. Identify those obligations under the compliance plan schedule in this Title V permit which the Permittee has not timely met, explain why they were not timely met, describe all measures taken or to be taken to meet them and identify the date by which the Permittee expects to meet them.

Any progress report prepared and submitted pursuant to RCSA §22a-174-33(q)(1) shall be simultaneously submitted by the Permittee to the Administrator.

#### **H. COMPLIANCE CERTIFICATIONS** [RCSA §22a-174-33(q)(2)]

The Permittee shall, on March 1 of each year, or on a more frequent schedule if specified in this Title V permit, submit to the commissioner a written compliance certification certified in accordance with RCSA §22a-174-2a(a)(5) and which includes the information identified in 40 CFR §§70.6(c)(5)(iii)(A) to (C), inclusive.

Any compliance certification prepared and submitted pursuant to RCSA §22a-174-33(q)(2) shall be simultaneously submitted by the Permittee to the Administrator.

#### **I. PERMIT DEVIATION NOTIFICATIONS** [RCSA §22a-174-33(p)]

Notwithstanding Section VI.D of this Title V permit, the Permittee shall notify the commissioner in writing, on forms prescribed by the commissioner, of any deviation from an emissions limitation, and shall identify the cause or likely cause of such deviation, all corrective actions and preventive measures taken with respect thereto, and the dates of such actions and measures as follows:

1. For any hazardous air pollutant, no later than 24 hours after such deviation commenced; and
2. For any other regulated air pollutant, no later than ten days after such deviation commenced.

#### **J. PERMIT RENEWAL** [RCSA §22a-174-33(j)(1)(B)]

All of the terms and conditions of this Title V permit shall remain in effect until the renewal permit is issued or denied provided that a timely renewal application is filed in accordance with RCSA §§22a-174-33(g), -33(h), and -33(i).

## **Section VI: Title V Requirements**

### **Title V Requirements**

#### **K. OPERATE IN COMPLIANCE [RCSA §22a-174-33(j)(1)(C)]**

The Permittee shall operate the source in compliance with the terms of all applicable regulations, the terms of this Title V permit, and any other applicable provisions of law. In addition, any noncompliance constitutes a violation of the Clean Air Act and Chapter 446c of the Connecticut General Statutes and is grounds for federal and/or state enforcement action, permit termination, revocation and reissuance, or modification, and denial of a permit renewal application.

#### **L. COMPLIANCE WITH PERMIT [RCSA §22a-174-33(j)(1)(G)]**

This Title V permit shall not be deemed to:

1. Preclude the creation or use of emission reduction credits or allowances or the trading thereof in accordance with RCSA §§22a-174-33(j)(1)(I) and -33(j)(1)(P), provided that the commissioner's prior written approval of the creation, use, or trading is obtained;
2. Authorize emissions of an air pollutant so as to exceed levels prohibited pursuant to 40 CFR Part 72;
3. Authorize the use of allowances pursuant to 40 CFR Parts 72 through 78, inclusive, as a defense to noncompliance with any other applicable requirement; or
4. Impose limits on emissions from items or activities specified in RCSA §§22a-174-33(g)(3)(A) and -33(g)(3)(B) unless imposition of such limits is required by an applicable requirement.

#### **M. INSPECTION TO DETERMINE COMPLIANCE [RCSA §22a-174-33(j)(1)(M)]**

The commissioner may, for the purpose of determining compliance with this Title V permit and other applicable requirements, enter the premises at reasonable times to inspect any facilities, equipment, practices, or operations regulated or required under such permit; to sample or otherwise monitor substances or parameters; and to review and copy relevant records lawfully required to be maintained at such premises in accordance with this Title V permit. It shall be grounds for permit revocation should entry, inspection, sampling, or monitoring be denied or effectively denied, or if access to and the copying of relevant records is denied or effectively denied.

#### **N. PERMIT AVAILABILITY**

The Permittee shall have available at the facility at all times a copy of this Title V permit.

#### **O. SEVERABILITY CLAUSE [RCSA §22a-174-33(j)(1)(R)]**

The provisions of this Title V permit are severable. If any provision of this Title V permit or the application of any provision of this Title V permit to any circumstance is held invalid, the remainder of this Title V permit and the application of such provision to other circumstances shall not be affected.

#### **P. NEED TO HALT OR REDUCE ACTIVITY [RCSA §22a-174-33(j)(1)(T)]**

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this Title V permit.

#### **Q. PERMIT REQUIREMENTS [RCSA §22a-174-33(j)(1)(V)]**

The filing of an application or of a notification of planned changes or anticipated noncompliance does not stay the Permittee's obligation to comply with this Title V permit.

#### **R. PROPERTY RIGHTS [RCSA §22a-174-33(j)(1)(W)]**

This Title V permit does not convey any property rights or any exclusive privileges. This Title V permit is subject to, and in no way derogates from any present or future property rights or other rights or powers of the State of Connecticut, and is further subject to any and all public and private rights and to any federal, state or local laws or regulations pertinent to the facility or regulated activity affected thereby, including CGS §4-181a(b) and RCSA §22a-3a-5(b). This Title V permit shall neither create nor affect any rights of persons who are not

## Section VI: Title V Requirements

### Title V Requirements

parties to this Title V permit.

#### **S. ALTERNATIVE OPERATING SCENARIO RECORDS** [RCSA §22a-174-33(o)(3)]

The Permittee shall, contemporaneously with making a change authorized by this Title V permit from one alternative operating scenario to another, maintain a record at the premises indicating when changes are made from one operating scenario to another and shall maintain a record of the current alternative operating scenario.

#### **T. OPERATIONAL FLEXIBILITY AND OFF-PERMIT CHANGES** [RCSA §22a-174-33(r)(2)]

The Permittee may engage in any action allowed by the Administrator in accordance with 40 CFR §§70.4(b)(12)(i) to (iii)(B), inclusive, and 40 CFR §§70.4(b)(14)(i) to (iv), inclusive, without a Title V non-minor permit modification, minor permit modification or revision and without requesting a Title V non-minor permit modification, minor permit modification or revision provided such action does not:

1. Constitute a modification under 40 CFR Part 60, 61 or 63;
2. Exceed emissions allowable under the subject permit;
3. Constitute an action which would subject the Permittee to any standard or other requirement pursuant to 40 CFR Parts 72 to 78, inclusive; or
4. Constitute a non-minor permit modification pursuant to RCSA §22a-174-2a(d)(4).

At least seven days before initiating an action specified in RCSA §22a-174-33(r)(2)(A), the Permittee shall notify the Administrator and the commissioner in writing of such intended action.

#### **U. INFORMATION FOR NOTIFICATION** [RCSA §22a-174-33(r)(2)(A)]

Written notification required under RCSA §22a-174-33(r)(2)(A) shall include a description of each change to be made, the date on which such change will occur, any change in emissions that may occur as a result of such change, any Title V permit terms and conditions that may be affected by such change, and any applicable requirement that would apply as a result of such change. The Permittee shall thereafter maintain a copy of such notice with the Title V permit. The commissioner and the Permittee shall each attach a copy of such notice to their copy of the Title V permit.

#### **V. TRANSFERS** [RCSA §22a-174-2a(g)]

No person other than the Permittee shall act or refrain from acting under the authority of this Title V permit unless such permit has been transferred to another person in accordance with RCSA §22a-174-2a(g).

The proposed transferor and transferee of a permit shall submit to the commissioner a request for a permit transfer on a form provided by the commissioner. A request for a permit transfer shall be accompanied by any fees required by any applicable provision of the general statutes or regulations adopted thereunder. The commissioner may also require the proposed transferee to submit with any such request, the information identified in CGS §22a-6m.

#### **W. REVOCATION** [RCSA §22a-174-2a(h)]

The commissioner may revoke this Title V permit on his own initiative or on the request of the Permittee or any other person, in accordance with CGS §4-182(c), RCSA §22a-3a-5(d), and any other applicable law. Any such request shall be in writing and contain facts and reasons supporting the request. The Permittee requesting revocation of this Title V permit shall state the requested date of revocation and provide evidence satisfactory to the commissioner that the subject source is no longer a Title V source.

Pursuant to the Clean Air Act, the Administrator has the power to revoke this Title V permit. Pursuant to the Clean Air Act, the Administrator also has the power to reissue this Title V permit if the Administrator has



## **Section VI: Title V Requirements**

### **Title V Requirements**

determined that the commissioner failed to act in a timely manner on a permit renewal application.

This Title V permit may be modified, revoked, reopened, reissued, or suspended by the commissioner, or the Administrator in accordance with RCSA §22a-174-33(r), CGS §22a-174c, or RCSA §22a-3a-5(d).

#### **X. REOPENING FOR CAUSE [RCSA §22a-174-33(s)]**

This Title V permit may be reopened by the commissioner, or the Administrator in accordance with RCSA §22a-174-33(s).

#### **Y. CREDIBLE EVIDENCE**

Notwithstanding any other provision of this Title V permit, for the purpose of determining compliance or establishing whether a Permittee has violated or is in violation of any permit condition, nothing in this Title V permit shall preclude the use, including the exclusive use, of any credible evidence or information.